

| MDL Privilege Number | Production Beg Bates | Date | Custodian | Author | Recipient | CC | Description | Privilege Claim | PEC's Challenge | RS Response |
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| ABDCMDL_PRIV_5472 | | 11/4/2016 | Weissman, G. | Cardinal Health | | | Draft Distributor talking points on opioid abuse prepared for review by counsel | Attorney-Client Privilege; Work Product | Specific author not identified. No recipients identified. Third party involvement destroys privilege. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5473 | | 11/4/2016 | Weissman, G. | Cardinal Health | | | Draft Distributor talking points on opioid abuse prepared for review by counsel | Attorney-Client Privilege; Work Product | Specific author not identified. No recipients identified. Third party involvement destroys privilege. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5474 | | 11/5/2016 | Weissman, G. | Cardinal Health | | | Draft Distributor talking points on opioid abuse prepared for review by counsel | Attorney-Client Privilege; Work Product | Specific author not identified. No recipients identified. Third party involvement destroys privilege. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5475 | | 11/5/2016 | Weissman, G. | Cardinal Health | | | Draft Distributor talking points on opioid abuse prepared for review by counsel | Attorney-Client Privilege; Work Product | Specific author not identified. No recipients identified. Third party involvement destroys privilege. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5476 | | 11/5/2016 | Weissman, G. | Cardinal Health | | | Draft Distributor talking points on opioid abuse prepared for review by counsel | Attorney-Client Privilege; Work Product | Specific author not identified. No recipients identified. Third party involvement destroys privilege. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5477 | | 12/28/2016 | Weissman, G. | Weissman, Gabriel | | | Draft Op-Ed prepared at the direction of the ABC Legal Department for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5478 | | 12/29/2016 | Weissman, G. | Weissman, Gabriel | | | Draft Op-Ed prepared at the direction of the ABC Legal Department for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5479 | | 1/5/2017 | Weissman, G. | Weissman, Gabriel | | | Edits to draft W. Va. AG press release re settlement of litigation, prepared at the direction of the ABC Legal Department for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5480 | | 1/6/2017 | Weissman, G. | Weissman, Gabriel | | | Draft Op-Ed prepared at the direction of the ABC Legal Department for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5481 | | 1/9/2017 | Weissman, G. | Weissman, Gabriel | | | Draft Distributor talking points on opioid abuse prepared for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5482 | | 1/9/2017 | Weissman, G. | Weissman, Gabriel | | | Draft Distributor talking points on opioid abuse prepared for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5491 | | 8/24/2017 | Weissman, G. | Weissman, Gabriel | | | Draft Op-Ed on distributor role in the supply chain prepared at the direction of the ABC Legal Department for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |

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| ABDCMDL_PRIV_5492 | | 8/24/2017 | Weissman, G. | Weissman, Gabriel | | | Draft Op-Ed on distributor role in the supply chain prepared at the direction of the ABC Legal Department for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5493 | | 9/12/2017 | Weissman, G. | Weissman, Gabriel | | | Draft Op-Ed on distributor role in the supply chain prepared at the direction of the ABC Legal Department for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5494 | | 9/26/2017 | Weissman, G. | Weissman, Gabriel | | | Draft messages and talking points for Hill meetings relating to opioids, prepared at the direction of the ABC Legal Department for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5498 | | 10/14/2017 | Weissman, G. | Weissman, Gabriel | | | Draft internal messaging regarding recent media coverage of distributors and the opioid crisis, prepared at the direction of the ABC Legal Department for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5503 | | 11/4/2017 | Weissman, G. | Weissman, Gabriel | | | Draft Op-Ed prepared at the direction of the ABC Legal Department for review by counsel in connection with 60 minutes coverage | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5504 | | 11/6/2017 | Weissman, G. | Weissman, Gabriel | | | Draft PowerPoint presentation analyzing Washington Post/60 Minutes claims regarding lobbying expenses, prepared at the direction of the ABC Legal Department for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5506 | | 11/7/2017 | Weissman, G. | Weissman, Gabriel | | | Draft press release prepared at the direction of the ABC Legal Department for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5508 | | 11/8/2017 | Weissman, G. | Weissman, Gabriel | | | Redacted draft package of media materials prepared for the board of directors reflecting legal advice and strategy of the ABC Legal Department. | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted portion reflects legal advice/strategy from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_5514 | | 11/9/2017 | Weissman, G. | Weissman, Gabriel | | | Redacted draft package of media materials prepared for the board of directors reflecting legal advice and strategy of the ABC Legal Department. | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted portion reflects legal advice/strategy from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_5519 | | 11/28/2017 | Weissman, G. | Weissman, Gabriel | | | Draft press release prepared at the direction of the ABC Legal Department for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5520 | | 11/29/2017 | Weissman, G. | Weissman, Gabriel | | | Draft press release prepared at the direction of the ABC Legal Department for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |

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| ABDCMDL_PRIV_5521 | | 11/30/2017 | Weissman, G. | Weissman, Gabriel | | | Draft press release prepared at the direction of the ABC Legal Department for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5525 | | 12/6/2017 | Weissman, G. | Weissman, Gabriel | | | Draft press release prepared at the direction of the ABC Legal Department for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5526 | | 12/12/2017 | Weissman, G. | Weissman, Gabriel | | | Draft press release prepared at the direction of the ABC Legal Department for review by counsel | Attorney-Client Privilege; Work Product | No recipients identified. Distribution not identified. Attorney involvement is not apparent and no specific attorney identified. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5528 | | 2/6/2018 | Weissman, G. | Reservoir Communications | Healthcare Distribution Alliance | | Draft talking points and key messaging document relating to opioid litigation and media scrutiny, prepared at the direction fo the ABC Legal Deaprtment for review by counsel | Attorney-Client Privilege | Third party involvement destroys privilege. Specific author not identified. Specific recipients not identified. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5557 | | 3/22/2017 | Tallamy, Brad | Tallamy, Brad | Weissman, Gabriel | | Redacted email chain among client employees and in-house counsel (Campbell, Elizabeth/Esq.) discussing legal strategy regarding responses to media reporting and inquiries. | Attorney-Client Privilege | Attorney involvement is indirect and/or not not apparent. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communications contain/reflect requests for legal advice from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_5558 | | 4/20/2017 | Tallamy, Brad | Mitchell, Beth | Tallamy, Brad | | Email among client employees discussing legal advice from in-house counsel (E. Campbell/Esq.) regarding overview of the severity of the opioid crisis. | Attorney-Client Privilege | Attorney involvement is indirect and/or not not apparent. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5566 | | 5/11/2017 | Tallamy, Brad | Tallamy, Brad | Zimmerman, Chris; Reed, Chuck; Kounelis, Peter; May, David; Mays, Steve; Ross, Paul | Norton, Rita; Heller, Stacie; Campbell, Elizabeth/Esq.; Weissman, Gabriel | Email from client to in-house counsel seeking legal advice regarding opioid legislation. | Attorney-Client Privilege | Attorney involvement is indirect and/or not not apparent. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5568 | | 5/11/2017 | Tallamy, Brad | Tallamy, Brad | May, David | | Redacted email chain among client employees discussing legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding ongoing litigation and proposed legislation. | Attorney-Client Privilege | Attorney involvement is indirect and/or not not apparent. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communications discuss legal advice from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_5570 | | 5/23/2017 | Tallamy, Brad | Tallamy, Brad | Zimmerman, Chris; May, David; Reed, Chuck; Kounelis, Peter; Mays, Steve; Ross, Paul; Norton, Rita; Heller, Stacie; Campbell, Elizabeth/Esq.; Weissman, Gabriel; Chou, John/Esq. | | Email from client to in-house counsel seeking legal advice regarding response to opioid policy steering committee. | Attorney-Client Privilege | Large distribution indicates lack of privilege. Subject involves a business and/or regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5571 | | 5/30/2017 | Tallamy, Brad | Tallamy, Brad | Nightengale, Brian; Weissman, Gabriel; Lane, Christine | Moyer, Lauren | Redacted email chain among client employees and in-house counsel (Campbell, Elizabeth/Esq.) discussing legal strategy regarding responses to media reporting and inquiries. | Attorney-Client Privilege | Attorney involvement is indirect and/or not not apparent. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communications contain/reflect requests for legal advice from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_5579 | | 8/16/2017 | Tallamy, Brad | Nightengale, Brian | Tallamy, Brad | | Email among client employees discussing legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding opioid task force. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business/regulatory matter, and not a legal one. Privilege calim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |

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| ABDCMDL_PRIV_5584 | | 8/29/2017 | Tallamy, Brad | Norton, Rita | Tallamy, Brad | | Redacted email chain among client employees and in-house counsel (Campbell, Elizabeth/Esq.) discussing legal strategy regarding responses to media reporting and inquiries. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communications contain/reflect requests for legal advice from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_5588 | | 8/31/2017 | Tallamy, Brad | Mitchell, Beth | Tallamy, Brad | | Email among client employees prepared at the direction of the ABC Legal Department regarding opioid task force. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5593 | | 9/5/2017 | Tallamy, Brad | Norton, Rita | Tallamy, Brad; Eddy, Julie | Heller, Stacie; Mitchell, Beth; O'Sullivan, Ashley | Redacted email chain among client employees and in-house counsel (Campbell, Elizabeth/Esq.) discussing legal strategy regarding responses to media reporting and inquiries. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communications contain/reflect requests for legal advice from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_5598 | | 9/14/2017 | Tallamy, Brad | Norton, Rita | Heller, Stacie; Tallamy, Brad; Mitchell, Beth; Eddy, Julie; O'Sullivan, Ashley | | Email among client employees discussing legal advice (Campbell, Elizabeth/Esq.) regarding review of HDA recommendations. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5599 | | 9/18/2017 | Tallamy, Brad | Tallamy, Brad | Heller, Stacie; Norton, Rita; Mitchell, Beth; Eddy, Julie; O'Sullivan, Ashley | | Email with attachment among client employees discussing information prepared at the direction of in-house counsel (Campbell, Elizabeth/Esq.) regarding Policy Committee meeting agenda. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5600 | | 9/18/2017 | Tallamy, Brad | Norton, Rita | O'Sullivan, Ashley; Tallamy, Brad; Mitchell, Beth; Heller, Stacie | | Redacted email chain among client employees and in-house counsel (Chou, John/Esq.) seeking and providing legal advice regarding draft press release. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication to/from in-house counsel is privileged as it related to provision of legal advice. Description revised to reflect same. |
| ABDCMDL_PRIV_5601 | | 9/18/2017 | Tallamy, Brad | Norton, Rita | Tallamy, Brad | | Redacted email chain among client employees and in-house counsel (Campbell, Elizabeth/Esq.) discussing legal strategy regarding responses to media reporting and inquiries. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communications contain/reflect requests for legal advice from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_5608 | | 9/27/2017 | Tallamy, Brad | Lorenz-Fisher, Susan | Campbell, Elizabeth/Esq.; Laepple Hertzog, Kate; DiCicco, Diane; Mitchell, Beth; Tallamy, Brad; Weissman, Gabriel | Zonia, Theresa/Tierney | Email with attachments from client to in-house counsel seeking legal advice regarding opioid workshop. | Attorney-Client Privilege | Third party involvement destroys privilege. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5611 | | 11/11/2017 | Tallamy, Brad | Tallamy, Brad | Weissman, Gabriel; Mauch, Robert; Chou, John/Esq.; Clark, Gina; Campbell, Elizabeth/Esq.; Norton, Rita; Zimmerman, Chris; Casalenuovo, Christopher/Esq.; May, David | Mattox, Keri; Gunning, Francesca; Murphy, Bennett | Email with attachment from client to in-house counsel seeking legal advice regarding review of draft opioid policy. | Attorney-Client Privilege | Large distribution indicates lack of privilege. Subject involves a business and/or regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5612 | | 11/11/2017 | Tallamy, Brad | Norton, Rita | Mitchell, Beth | Tallamy, Brad; O'Sullivan, Ashley | Email among client employees discussing need for legal advice from in-house counsel (Chou, John/Esq.) regarding draft opioid policy. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |

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| ABDCMDL_PRIV_5615 | | 11/13/2017 | Tallamy, Brad | Weissman, Gabriel | Clare/Reservoir; Schooling, Robert/Reservoir; Romero, Lauren; Sauerhaft, Roger/Slone PR; Zimmerman, Chris; Gunning, Francesca; Tallamy, Brad; Clark, Gina; Brandt, Darren/Slone PR; Norton, Rita; May, David; Parker, John/HDA; Casalenuovo, Christopher/Esq.; Webb, Matthew; Chou, John/Esq.; Traynor, Kate/Sloane PR; Zacchei, Dan/Sloane PR; Campbell, Elizabeth/Esq. | | Email with attachments from client to in-house counsel and trade group seeking legal advice regarding presentation on the industry response to the opioid epidemic. | Attorney-Client Privilege; Common Interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00473148 |
| ABDCMDL_PRIV_5616 | | 11/13/2017 | Tallamy, Brad | Tallamy, Brad | Gaddes, Kathy | | Email from client to in-house counsel seeking legal advice regarding ABC opioid policy press release. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5617 | | 11/13/2017 | Tallamy, Brad | Tallamy, Brad | Weissman, Gabriel | | Email among client employees discussing need for legal advice from in-house counsel regarding opioid strategy. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5618 | | 11/13/2017 | Tallamy, Brad | Tallamy, Brad | Mauch, Robert | | Email among client employees discussing need for legal advice from in-house counsel (Chou, John/Esq.) regarding ABC opioid policy press release. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5619 | | 11/13/2017 | Tallamy, Brad | Norton, Rita | Tallamy, Brad | | Email among client employees discussing request for legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding strategy for conversation in response to opioid abuse. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5626 | | 11/28/2017 | Tallamy, Brad | Tallamy, Brad | Norton, Rita | | Email with attachment among client employees discussing legal advice (Campbell, Elizabeth/Esq.) regarding draft statement on opioid operations. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5628 | | 11/28/2017 | Tallamy, Brad | Tallamy, Brad | Weissman, Gabriel | Norton, Rita | Email with attachment among client employees discussing public affairs strategy prepared at the direction of the ABC Legal Department regarding draft statement. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5632 | | 11/29/2017 | Tallamy, Brad | Norton, Rita | Heller, Stacie; Tallamy, Brad; Mitchell, Beth | | Email with attachments among client employees discussing request for legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding review of educational programs to prevent opioid abuse. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5641 | | 12/7/2017 | Tallamy, Brad | Tallamy, Brad | Norton, Rita; O'Sullivan, Ashley | | Email with attachment among client employees discussing opioid task force slides prepared at the direction of ABC Legal department. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5642 | | 12/8/2017 | Tallamy, Brad | Tallamy, Brad | Norton, Rita; Heller, Stacie | O'Sullivan, Ashley | Email among client employees discussing need for legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding legislative strategy. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5643 | | 12/8/2017 | Tallamy, Brad | Tallamy, Brad | O'Sullivan, Ashley; Norton, Rita | | Email with attachment among client employees discussing opioid task force slides prepared at the direction of ABC Legal department. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |

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| ABDCMDL_PRIV_5652 | | 12/17/2017 | Tallamy, Brad | Norton, Rita | Feehery, John/EFB Advocacy | Tallamy, Brad | Email with attachments among client employees discussing need for legal advice from in-house counsel (Chou, John/Esq.; Bak, Hyung/Esq.) regarding media response to the opioid crisis. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney involvement is indirect and/or not apparent. Subject involves a business and/or regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5655 | | 1/2/2018 | Tallamy, Brad | O'Sullivan, Ashley | Tallamy, Brad | | Email with attachment among client employees discussing opioid task force slides prepared at the direction of ABC Legal department. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege calim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5656 | | 1/10/2018 | Tallamy, Brad | Tallamy, Brad | Norton, Rita | | Email among client employees discussing information prepared at the direction of ABC Legal Department regarding opioid task force. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege calim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5657 | | 1/10/2018 | Tallamy, Brad | Norton, Rita | Tallamy, Brad | | Email with attachments among client employees discussing legal advice from ABC Legal Department regarding opioid taskforce. | Attorney-Client Privilege; Work Product | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege calim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5658 | | 1/15/2018 | Tallamy, Brad | Scheidt, Scott | Meredith, Emily; O'Sullivan, Ashley; Mitchell, Vivienne; Davis, Laura; Tallamy, Brad | | Email with attachment among client employees discussing legal advice from ABC Legal Department regarding opioid taskforce. | Attorney-Client Privilege; Work Product | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege calim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5665 | | 1/19/2018 | Tallamy, Brad | Tallamy, Brad | Feehery, John/EFB Advocacy; Norton, Rita | | Email with attachments among client employees discussing request for legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding draft opinion piece on the opioid crisis. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney involvement is indirect and/or not apparent. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5666 | | 1/24/2018 | Tallamy, Brad | Tallamy, Brad | Irizarry, Steven/Roberti Global | Campbell, Elizabeth/Esq.; O'Sullivan, Ashley | Email from client to in-house counsel and consultant seeking legal advice regarding analysis of negative effects of opioid abuse. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney involvement is indirect and/or not apparent. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5671 | | 1/26/2018 | Tallamy, Brad | Tallamy, Brad | Norton, Rita | O'Sullivan, Ashley | Email with attachment among client employees discussing opioid task force slides prepared at the direction of ABC Legal department. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege calim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5672 | | 1/26/2018 | Tallamy, Brad | O'Sullivan, Ashley | Tallamy, Brad | | Email with attachment among client employees discussing opioid task force slides prepared at the direction of ABC Legal department. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege calim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5675 | | 1/30/2018 | Tallamy, Brad | Tallamy, Brad | Scheidt, Scott; Norton, Rita | O'Sullivan, Ashley | Email with attachment among client employees discussing opioid task force slides prepared at the direction of ABC Legal department. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege calim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5706 | | 2/16/2018 | Tallamy, Brad | Norton, Rita | Mitchell, Beth | Tallamy, Brad | Email among client employees discussing need for legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding request for review of draft advocacy materials. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege calim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5721 | | 2/22/2018 | Tallamy, Brad | Norton, Rita | Lohman, Donald/Esq./Mallinckrodt; Tyndall, Mark/Mallinckrodt; Naten, Derek/Mallinckrodt; Long, Erika/Mallinckrodt | Tallamy, Brad; O'Sullivan, Ashley | Email from client to manufacturer and manufacturer's counsel seeking legal advice regarding DEA clearinghouse proposal. | Attorney-Client Privilege; Common Interest | Third party involvement destroys privilege. Subject involves a business and/or regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00473157 |
| ABDCMDL_PRIV_5729 | | 2/27/2018 | Tallamy, Brad | Tallamy, Brad | Norton, Rita; Heller, Stacie; Zimmerman, Chris; May, David; Mays, Steve; Campbell, Elizabeth/Esq. | Mitchell, Beth; O'Sullivan, Ashley | Email with attachments from client to in-house counsel seeking legal advice regarding feedback on new federal legislation. | Attorney-Client Privilege | Large distribution indicates lack of privilege. Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege calim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |

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| ABDCMDL_PRIV_5756 | | 3/15/2018 | Tallamy, Brad | Tallamy, Brad | Norton, Rita | | Email with attachments among client employees discussing request for legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding controlled substance media update. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege calim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5760 | | 3/16/2018 | Tallamy, Brad | Tallamy, Brad | Scheidt, Scott; Norton, Rita | O'Sullivan, Ashley | Email with attachments among client employees discussing opioid task force slides prepared at the direction of ABC Legal Department. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege calim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5761 | | 3/16/2018 | Tallamy, Brad | Tallamy, Brad | Freitas, Kristen/HDA | Norton, Rita | Email between client and consultant discussing legal advice from outside counsel (Graefe, Frederick/Esq./Graefe Law) regarding Senate hearings. | Attorney-Client Privilege; Common Interest | Third party involvement destroys privilege. Attorney involvement is indirect and/or not aparent. Subject involves a business and/or regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00473159 |
| ABDCMDL_PRIV_5791 | | 4/17/2018 | Tallamy, Brad | Tallamy, Brad | Zimmerman, Chris | Weissman, Gabriel; Campbell, Elizabeth/Esq.; Casalenuovo, Christopher/Esq.; May, David; Chou, John/Esq.; Clark, Gina; Norton, Rita; Esposito, Lauren | Redacted email from in-house counsel (Campbell, Elizabeth/Esq.) providing legal advice regarding response to media inquiry. | Attorney-Client Privilege | Large distribution indicates lack of privilege. Attorney involvement is indirect and/or not aparent. Subject involves a business matter, and not a legal one. Privilege calim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communications reflect legal advice from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_5792 | | 4/17/2018 | Tallamy, Brad | Scheidt, Scott | Tallamy, Brad | | Email among client employees discussing need for legal advice from in-house counsel (Chou, John/Esq.) regarding opioid policy. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business/regulatory matter, and not a legal one. Privilege calim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5810 | | 4/25/2018 | Tallamy, Brad | Tallamy, Brad | Meredith, Emily; Norton, Rita | | Email with attachment among client employees discussing talking points prepared at the direction of the ABC Legal Department regarding S. 483. | Attorney-Client Privilege | Attorney involvement is indirect and/or not aparent. Subject involves a business/regulatory matter, and not a legal one. Privilege calim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5855 | | 5/16/2018 | Tallamy, Brad | Tallamy, Brad | Freitas, Kristen/HDA | | Email among client employees discussing request for legal advice from in-house counsel (Casalenuovo, Chris/Esq.) regarding thoughts on federal suspicious order monitoring legislation. | Attorney-Client Privilege; Common Interest | Third party involvement destroys privilege. Subject involves a business and/or regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00473165 |
| ABDCMDL_PRIV_5869 | | 2/25/2011 | Norton, Rita | Eddy, Julie | Norton, Rita | | Email among client employees discussing legal advice from in-house counsel (Chou, John/Esq.) regarding proposed Ohio legislation. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5870 | | 5/28/2015 | Norton, Rita | Anderson, Mary | Norton, Rita | | Email among client employees discussing legal advice from in-house counsel (Chou, John/Esq.) regarding Senator Manchin letter. | Attorney-Client Privilege; Work Product | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5871 | | 6/3/2015 | Norton, Rita | Norton, Rita | Eddy, Julie | | Email among client employees discussing information prepared at the direction of HDMA counsel (Gallenagh, Elizabeth/Esq./HDMA) regarding draft legislation. | Attorney-Client Privilege; Common Interest | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472851 |
| ABDCMDL_PRIV_5872 | | 6/7/2015 | Norton, Rita | Norton, Rita | Tallamy, Brad | | Email with attachments among client employees discussing legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding Senator Manchin meeting. | Attorney-Client Privilege; Work Product | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation. Communication circulates and discusses work product created by in-house counsel. |
| ABDCMDL_PRIV_5873 | | 6/7/2015 | Norton, Rita | Norton, Rita | Roberti, Vincent/Roberti Global; Irizarry, Steven/Roberti Global; Tallamy, Brad | | Email with attachments among client employees and consultant discussing legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding Senator Manchin meeting. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation. Communication circulates and discusses work product created by in-house counsel. |
| ABDCMDL_PRIV_5874 | | 6/16/2015 | Norton, Rita | Norton, Rita | Roberti, Vincent/Roberti Global | | Email from client to consultant discussing request for legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding Senator Manchin letter. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation. Communication forwards and discusses request for legal advice from in-house counsel. |

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| ABDCMDL_PRIV_5877 | | 6/18/2015 | Norton, Rita | Norton, Rita | Tallamy, Brad | Norton, Rita | Email with attachment from client to consultant discussing legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding Senator Manchin letter. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation. Communication forwards and discusses request for legal advice from in-house counsel. |
| ABDCMDL_PRIV_5884 | | 6/26/2015 | Norton, Rita | Norton, Rita | Anderson, Mary | | Email with attachments among client employees discussing legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding Senator Manchin meeting. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication to/from in-house counsel is privileged as it related to provision of legal advice. |
| ABDCMDL_PRIV_5885 | | 6/26/2015 | Norton, Rita | Norton, Rita | Norton, Rita | | Email with attachments among client employees reflecting legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding Senator Manchin meeting. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication to/from in-house counsel is privileged as it related to provision of legal advice. |
| ABDCMDL_PRIV_5886 | | 6/29/2015 | Norton, Rita | Davis, Laura | Davis, Laura; Tallamy, Brad; Anderson, Mary; Money, Jason | | Redacted email from client to in-house counsel (Chou, John/Esq.) seeking legal advice regarding revisions to state official presentation. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted email contains request for legal advice to in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_5895 | | 7/20/2015 | Norton, Rita | Norton, Rita | Chou, John/Esq.; Zimmerman, Chris; May, David; Mosley, Amy; DiCenso, Frank; Money, Jason; Cincione, K./Vorys; Eddy, Julie; Hobson, David/FIA Advisors | | Email with attachment from client to in-house counsel and consultants seeking legal advice regarding DeWine meeting. | Attorney-Client Privilege | Large distribution indicates that communication is not privileged. Third party involvement destroys privilege. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5897 | | 7/29/2015 | Norton, Rita | Norton, Rita | Roberti, Vincent/Roberti Global; Irizarry, Steven/Roberti Global; Jenkins, Tim/Esq./Nossaman; Quinn, Paul/Esq./Nossaman; Mortier, Jeff/RVMB; Tongour, Michael/TCH Group; Holsclaw, Brad/TCH Group; Wiley, D./TCH Group; Tallamy, Brad; Money, Jason | | Email from client to consultants and outside counsel seeking legal advice regarding DEA recommendations. | Attorney-Client Privilege | Large distribution indicates that communication is not privileged. Third party involvement destroys privilege. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5898 | | 8/18/2015 | Norton, Rita | Norton, Rita | Tongour, Michael/TCH Group; Roberti, Vincent/Roberti Global; Irizarry, Steven/Roberti Global; Jenkins, T./Esq./Nossman; Walter, Sarah/Walter Group; Quinn, Paul/Esq./Nossaman; Mortier, J./RMVB | Money, Jason; Tallamy, Brad | Email with attachments from client to outside counsel and consultants seeking legal advice regarding S. 483. | Attorney-Client Privilege | Large distribution indicates that communication is not privileged. Third party involvement destroys privilege. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5899 | | 8/19/2015 | Norton, Rita | Norton, Rita | Norton, Rita | | Email with attachments among client employees discussing legal advice from HDMA counsel (Gallenagh, Elizabeth/Esq.) regarding Rx abuse meeting. | Attorney-Client Privilege | Distribution is not identified. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472854 |
| ABDCMDL_PRIV_5901 | | 8/25/2015 | Norton, Rita | Norton, Rita | Freitas, Kristen/HDMA | | Email among client employee and consultant discussing need for legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding S. 483. | Attorney-Client Privilege; Common interest | Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472876 |
| ABDCMDL_PRIV_5905 | | 1/16/2016 | Norton, Rita | Norton, Rita | Roberti, Vincent/Roberti Global | | Email from client to consultant discussing legal advice from outside counsel (Quinn, Paul/Esq./Nossaman) regarding opioid-related legislation. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |

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| ABDCMDL_PRIV_5906 | | 1/17/2016 | Norton, Rita | Norton, Rita | Roberti, Vincent/Roberti Global | | Email from client to consultant discussing legal advice from outside counsel (Quinn, Paul/Esq./Nossaman) regarding opioid-related legislation. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5907 | | 2/1/2016 | Norton, Rita | Money, Jason | DiCenso, Frank; Delac, Frank | Norton, Rita; Tallamy, Brad; Heller, Stacie | Email with attachment among client employees discussing draft presentation prepared at the direction of the ABC Legal Department regarding Representative Stivers meeting. | Attorney-Client Privilege | Specific attorney not identified and/or attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5911 | | 2/11/2016 | Norton, Rita | Norton, Rita | Heller, Stacie; Tallamy, Brad; Money, Jason; Eddy, Julie | Anderson, Mary | Email with attachments among client employees discussing HDMA briefing regarding Masters litigation. | Attorney-Client Privilege | Specific attorney not identified and/or attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472934 |
| ABDCMDL_PRIV_5913 | | 2/17/2016 | Norton, Rita | Norton, Rita | Mauch, Robert | Heller, Stacie; Zimmerman, Chris; Hirst, D.; Campbell, Elizabeth/Esq.; Tallamy, Brad; Money, Jason; Eddy, Julie; Meehan, F.; Davis, Laura | Email from client to in-house counsel seeking legal advice regarding executive committee briefing. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5914 | | 2/22/2016 | Norton, Rita | Norton, Rita | Money, Jason; Tallamy, Brad; Heller, Stacie; Eddy, Julie | | Email with attachments among client employees discussing legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding Masters amicus brief. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5924 | | 4/2/2016 | Norton, Rita | Norton, Rita | Zimmerman, Chris | Lane, C.; May, David; Neu, Dave; Mauch, Robert | Email among client employees discussing legal advice from in-house counsel (Chou, John/Esq.) regarding presidential announcement regarding opioid crisis. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5927 | | 5/3/2016 | Norton, Rita | Norton, Rita | Heller, Stacie | | Email among client employees discussing legal advice from in-house counsel (Chou, John/Esq.) regarding response to Senator Schumer statement. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5932 | | 7/13/2016 | Norton, Rita | Norton, Rita | Hartman, S. | Eddy, Julie; Casalenuovo, Chris/Esq.; Heller, Stacie; Zimmerman, Chris; May, David | Redacted email chain among client employees and in-house counsel (Campbell, Elizabeth/Esq.) seeking and providing legal advice regarding customer education materials. | Attorney-Client Privilege | Large distribution indicates that communication is not privileged. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted emails from/to in-house counsel request and provide legal advice. Description revised to reflect same. |
| ABDCMDL_PRIV_5933 | | 8/18/2016 | Norton, Rita | Norton, Rita | May, David; Zimmerman, Chris | Caroline, David/Esq.; Campbell, Elizabeth/Esq.; Mays, Stephen; Tallamy, Brad; Hartman, Sharon | Email from client to in-house counsel seeking legal advice regarding opposition to Marino bill. | Attorney-Client Privilege | Large distribution indicates that communication is not privileged. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5934 | | 8/18/2016 | Norton, Rita | Norton, Rita | Freitas, Kristen/HDA; Gallenagh, Elizabeth/Esq./HDA | Tallamy, Brad | Email among client employees and HDA counsel regarding opposition to Marino bill. | Attorney-Client Privilege; Common interest | Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00473058 |
| ABDCMDL_PRIV_5935 | | 9/18/2016 | Norton, Rita | Norton, Rita | Heller, Stacie; Tallamy, Brad; Money, Jason | | Email with attachments with attachments prepared at the direction of the ABC Legal Department for the purpose of providing legal advice re draft Board Materials. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5936 | | 11/4/2016 | Norton, Rita | Weissman, Gabriel | Norton, Rita; Heller, Stacie; Tallamy, Brad | | Email among client employees discussing legal advice from in-house counsel (Chou, John/Esq.) regarding industry talking points. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |

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| ABDCMDL_PRIV_5937 | | 11/4/2016 | Norton, Rita | Norton, Rita | Weissman, Gabriel | Chou, John/Esq.; Norton, Rita | Email with attachment from client to in-house counsel seeking legal advice regarding HDA response document. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5938 | | 11/4/2016 | Norton, Rita | Weissman, Gabriel | Norton, Rita | Chou, John/Esq. | Email from client to in-house counsel seeking legal advice regarding draft language on DEA reporting system. | Attorney-Client Privilege | Subject of communication involves a business/regulatory matter, and not a legal one. In-house counsel is merely copied on communication. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5939 | | 11/5/2016 | Norton, Rita | Heller, Stacie | Norton, Rita | Tallamy, Brad | Email among client employees discussing legal advice from in-house counsel (Chou, John/Esq.) regarding HDA messaging. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472845 |
| ABDCMDL_PRIV_5940 | | 11/6/2016 | Norton, Rita | Chou, John/Esq. | Barry, Ellen/CAH; Morford, Craig/CAH; Schechter, Lori/McKesson | Norton, Rita; Weissman, Gabriel; Clark, Gina | Email from in-house counsel to client and distributors providing legal advice regarding opioid messaging. | Attorney-Client Privilege; Common interest | Topic of communication is a business matter, and not a legal one. Third party involvement destroys privilege. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5941 | | 11/6/2016 | Norton, Rita | Weissman, Gabriel | Mauch, Robert; Chou, John/Esq. | Clark, Gina; Norton, Rita | Email with attachment from client to in-house counsel seeking legal advice regarding draft industry talking points on opioid abuse. | Attorney-Client Privilege | Communication involves a business and/or non-legal matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5942 | | 11/7/2016 | Norton, Rita | Chou, John/Esq. | Morford, Craig/CAH; Hunter, Kristin/McKesson; Norton, Rita | Barry, Ellen/CAH; Schechter, Lori/McKesson; Weissman, Gabriel; Callinicos, Sean/CAH; Clark, Gina | Email from in-house counsel to client and distributors providing legal advice regarding opioid talking points. | Attorney-Client Privilege; Common interest | Topic of communication is a business matter, and not a legal one. Third party involvement destroys privilege. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472848 |
| ABDCMDL_PRIV_5943 | | 1/27/2017 | Norton, Rita | Norton, Rita | Weissman, Gabriel | Mauch, Robert; Campbell, Elizabeth/Esq.; Chou, John/Esq.; Zimmerman, Chris; May, David; Clark, Gina; Guttman, Tim; Mattox, Keri; Moyer, Lauren; Tallamy, Brad | Email from client to in-house counsel seeking legal advice regarding legislative efforts. | Attorney-Client Privilege | Large distribution indicates that communication is not privileged. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5944 | | 3/2/2017 | Norton, Rita | Anderson, Mary | Norton, Rita | | Email with attachments among client employees discussing legal advice from in-house counsel (Chou, John/Esq.) regarding news article about opioid protest. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5945 | | 3/3/2017 | Norton, Rita | Tallamy, Brad | Weissman, Gabriel | Norton, Rita | Email among client employees discussing legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding statement for press in response to opioid crisis. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5946 | | 3/9/2017 | Norton, Rita | Moyer, Lauren | Weissman, Gabriel; Norton, Rita; Heller, Stacie; Tallamy, Brad; Eddy, Julie; Mitchell, Beth | Chou, John/Esq.; Campbell, Elizabeth/Esq.; Mattox, Keri; Clark, Gina; DeAtley, Danny/ICS; Romero, Lauren; Putt, Jordan | Redacted email containing request for legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding response to media inquiry. | Attorney-Client Privilege | Large distribution indicates that communication is not privileged. Third party involvement destroys privilege. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication to in-house counsel is privileged as it seeks legal advice. Description revised to reflect same. |
| ABDCMDL_PRIV_5948 | | 3/15/2017 | Norton, Rita | Norton, Rita | Mitchell, Beth | Heller, Stacie; Tallamy, Brad; Eddy, Julie | Redacted email among client employees discussing need for legal advice from ABDC Legal Department regarding meetings with state officials. | Attorney-Client Privilege | Specific attorney not identified and/or attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communications reflect legal strategy discussions with ABDC Legal Department. Description revised to reflect same. |
| ABDCMDL_PRIV_5950 | | 5/9/2017 | Norton, Rita | Norton, Rita | Weissman, Gabriel; Chou, John/Esq.; Campbell, Elizabeth/Esq. | May, David; Heller, Stacie; Tallamy, Brad; Mattox, Keri; Guttman, Tim; Zimmerman, Chris; Moyer, Lauren; Clark, Gina; Mauch, Robert; DeAtley, Danny /ICS; Romero, L.; Putt, Jordan; DiCicco, Diane/Tierney; Hummel, Kristin/Tierney; Dodson, Sydney/Tierney | Email from client to in-house counsel and consultants seeking legal advice regarding Energy and Commerce inquiry. | Attorney-Client Privilege | Large distribution indicates that communication is not privileged. Third party involvement destroys privilege. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communications to/from in-house counsel discussing legal advice. |

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| ABDCMDL_PRIV_5952 | | 6/5/2017 | Norton, Rita | Norton, Rita | Tallamy, Brad; Campbell, Elizabeth/Esq.; Zimmerman, Chris; May, David; Eddy, Julie; Chou, John/Esq. | | Email with attachment from client to in-house counsel seeking legal advice regarding article. | Attorney-Client Privilege | Large distribution indicates that communication is not privileged. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5953 | | 6/5/2017 | Norton, Rita | Norton, Rita | Anderson, Mary | | Email with attachments among client employees discussing information prepared at the direction of the ABC Legal Department regarding board meeting. | Attorney-Client Privilege | Specific attorney not identified and/or attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5960 | | 6/20/2017 | Norton, Rita | Mitchell, B. | Norton, Rita; Heller, Stacie; Tallamy, Brad; Eddy, Julie | | Email with attachments among client employees discussing legal advice from outside counsel (Nicholson, Kevin/NACDS/Esq.) regarding public policy priorities. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5961 | | 6/21/2017 | Norton, Rita | Mitchell, B. | Heller, Stacie; Eddy, Julie | Tallamy, Brad; Norton, Rita | Email with attachments among client employees discussing legal advice from outside counsel (Nicholson, Kevin/NACDS/Esq.) regarding public policy priorities. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5963 | | 6/26/2017 | Norton, Rita | Mitchell, B. | Norton, Rita; Heller, Stacie; Eddy, Julie | | Email with attachments among client employees discussing legal advice from outside counsel (Nicholson, Kevin/NACDS/Esq.) regarding public policy priorities. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5965 | | 6/29/2017 | Norton, Rita | Norton, Rita | Davis, Laura | | Email with attachments among client employees discussing legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding draft response to Energy & Commerce Committee letter. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation. Communication forwards and discusses legal advice from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_5966 | | 6/30/2017 | Norton, Rita | Heller, Stacie | Norton, Rita; Eddy, Julie | | Email with attachment among client employees discussing need for legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding Masters. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5967 | | 6/30/2017 | Norton, Rita | Norton, Rita | Roberti, Vincent/Roberti Global | O'Sullivan, Ashley/Roberti Global | Redacted email chain among client employees and in-house counsel (Campbell, Elizabeth/Esq.) discussing legal strategy regarding responses to media reporting and inquiries. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication to/from in-house counsel is privileged as it related to provision of legal advice. Description revised to reflect same. |
| ABDCMDL_PRIV_5971 | | 7/10/2017 | Norton, Rita | Mauch, Robert | Norton, Rita; Clark, Gina; Weissman, Gabriel | Campbell, Elizabeth/Esq.; Chou, John/Esq. | Email from client to in-house counsel seeking legal advice regarding proposed public affairs campaign. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5976 | | 7/13/2017 | Norton, Rita | Mitchell, B. | Norton, Rita | Davis, Laura | Email with attachment among client employees discussing legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding CWAG meeting. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5982 | | 8/7/2017 | Norton, Rita | Mitchell, B. | Tallamy, Brad; Norton, Rita; Heller, Stacie; Eddy, Julie; O'Sullivan, Ashley | | Email with attachments from NACDS Legal providing legal advice regarding opioid workgroup. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5985 | | 8/18/2017 | Norton, Rita | Tallamy, Brad | Norton, Rita | | Email with attachment among client employees discussing legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding opioid task force meeting. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |

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| ABDCMDL_PRIV_5986 | | 8/18/2017 | Norton, Rita | Casalenuovo, Christopher/Esq. | Weissman, Gabriel; Clark, Gina | Mauch, Robert; Chou, John/Esq.; Campbell, Elizabeth/Esq.; Norton, Rita; Tallamy, Brad; Heller, Stacie; Moyer, Lauren; Meluso, Ginette; Hummel, Kristin/Tierney; McConnell, Kathy | Email with attachment from in-house counsel to client providing legal advice regarding draft editorial on the opioid crisis. | Attorney-Client Privilege | Large distribution indicates that communication is not privileged. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation. Email contains legal advice/work product provided by in-house counsel. |
| ABDCMDL_PRIV_5987 | | 8/19/2017 | Norton, Rita | Tallamy, Brad | Norton, Rita | | Email among client employees discussing request for legal advice from in-house counsel (Chou, John/Esq.) regarding draft opinion piece on the opioid crisis. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5988 | | 8/19/2017 | Norton, Rita | Campbell, Elizabeth/Esq. | Weissman, Gabriel; Clark, Gina; Mauch, Robert | Chou, John/Esq.; Casalenuovo, Christopher/Esq.; Norton, Rita; Tallamy, Brad; Heller, Stacie; Moyer, Lauren; Meluso, Ginette; Hummel, Kristin/Tierney; McConnell, Kathy/Tierney | Redacted email chain among client employees and in-house counsel (Campbell, Elizabeth/Esq.; Chou, John/Esq.) seeking and providing legal advice regarding draft editorial. | Attorney-Client Privilege | Large distribution indicates that communication is not privileged. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted portion of document reflects legal advice from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_5990 | | 8/22/2017 | Norton, Rita | Norton, Rita | Gansler, Doug/Esq./Buckley Sander | | Email with attachments from client to outside counsel seeking legal advice regarding Connecticut AG presentation. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation. Email contains request for legal advice from outside counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_5991 | | 8/23/2017 | Norton, Rita | Weissman, Gabriel | Norton, Rita | Campbell, Elizabeth/Esq.; Tallamy, Brad | Email from client to in-house counsel seeking legal advice regarding public statements on the opioid crisis. | Attorney-Client Privilege | Subject of communication involves a business/regulatory matter, and not a legal one. In-house counsel is merely copied on communication. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5992 | | 8/23/2017 | Norton, Rita | Mitchell, B. | Tallamy, Brad | Norton, Rita; Heller, Stacie; Mitchell, Beth; Eddy, Julie; O'Sullivan, Ashley | Email among client employees discussing legal advice (Campbell, Elizabeth/Esq.) regarding responses to the opioid epidemic. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5994 | | 8/23/2017 | Norton, Rita | Norton, Rita | O'Sullivan, Ashley | | Redacted email chain among client employees and in-house counsel (Campbell, Elizabeth/Esq.) discussing legal strategy regarding responses to media reporting and inquiries. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communications contain/reflect requests for legal advice from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_5996 | | 8/25/2017 | Norton, Rita | Reed, Chuck | Mitchell, B.; Norton, Rita; Heller, Stacie | Reinardy, Joseph/CenterX | Email with attachment among client employees discussing legal advice from NACDS counsel (Nicholson, Kevin/NACDS/Esq.) regarding public policy priorities for curbing opioid related dependence, overdose and death. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5997 | | 8/28/2017 | Norton, Rita | Mitchell, B. | Norton, Rita | | Email among client employees discussing request for legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding review of letter on solutions to the opioid crisis. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_5998 | | 8/29/2017 | Norton, Rita | Eddy, Julie | Norton, Rita; Heller, Stacie; Tallamy, Brad; Mitchell, Beth | | Redacted email chain among client employees and in-house counsel (Campbell, Elizabeth/Esq.) discussing legal strategy regarding responses to media reporting and inquiries. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communications contain/reflect requests for legal advice from in-house counsel. Description revised to reflect same. |

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| ABDCMDL_PRIV_5999 | | 8/29/2017 | Norton, Rita | Tallamy, Brad | Norton, Rita | | Redacted email chain among client employees and in-house counsel (Campbell, Elizabeth/Esq.) discussing legal strategy regarding responses to media reporting and inquiries. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communications contain/reflect requests for legal advice from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_6008 | | 9/5/2017 | Norton, Rita | Eddy, Julie | Norton, Rita; Tallamy, Brad | | Redacted email chain among client employees and in-house counsel (Campbell, Elizabeth/Esq.) discussing legal strategy regarding responses to media reporting and inquiries. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communications contain/reflect requests for legal advice from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_6009 | | 9/5/2017 | Norton, Rita | Tallamy, Brad | O'Neill, John/Harbinger; Irizarry, Steven/Roberti Global; Tongour, Mike/TCH Group; White, Joel/Horizon; Roberti, Vincent/Roberti Global; Simpson, Al/Mercury, LLC; Cincione, Karen/Vorys; Niehaus, Thomas/Vorys | Norton, Rita; Heller, Stacie; Mitchell, Beth; Eddy, Julie; O'Sullivan, Ashley | Email with attachment among client employees and consultant discussing information prepared at the direction of the ABC Legal Department regarding communications strategy. | Attorney-Client Privilege | Large distribution indicates that communication is not privileged. Third party involvement destroys privilege. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6010 | | 9/8/2017 | Norton, Rita | Mitchell, B. | Heller, Stacie; Norton, Rita; Eddy, Julie; Tallamy, Brad; O'Sullivan, Ashley | Reed, Chuck; Kounelis, Peter | Email with attachments among client employees discussing legal advice from NACDS counsel (Nicholson, Kevin/NACDS/Esq.) regarding public policy priorities for curbing opioid related dependence, overdose and death. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6014 | | 9/15/2017 | Norton, Rita | Tallamy, Brad | Jenkins, Tim/Esq./Nossaman; O'Neill, John/Harbinger; Irizarry, Steven/Roberti Global; Tongour, Michael/TCH Group; White, Joel/Horizon; Roberti, Vincent/Roberti Global; Simpson, Al/Mercury, LLC; Cincione, Karen/Vorys; Niehaus, Thomas/Vorys; Norton, Rita; Heller, Stacie; Mitchell, Beth; Eddy, Julie; O'Sullivan, Ashley | | Email among client employees and consultants discussing information prepared at the direction of the ABC Legal Department regarding communications strategy. | Attorney-Client Privilege | Large distribution indicates that communication is not privileged. Third party involvement destroys privilege. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6019 | | 9/19/2017 | Norton, Rita | Heller, Stacie | Norton, Rita; Tallamy, Brad | O'Sullivan, Ashley | Email with attachment among client employees discussing information prepared at the direction of the ABC Legal Department regarding opioid task force. | Attorney-Client Privilege | Specific attorney not identified and/or attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6020 | | 9/22/2017 | Norton, Rita | Mitchell, B. | Tallamy, Brad; Norton, Rita; Heller, Stacie; O'Sullivan, Ashley | | Email with attachment among client employees discussing information prepared at the direction of the ABC Legal Department regarding opioid task force. | Attorney-Client Privilege | Specific attorney not identified and/or attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6024 | | 9/25/2017 | Norton, Rita | Mitchell, B. | James, Kevin/US Bio Services | Norton, Rita; Heller, Stacie | Email among client employees and consultant discussing the need for legal advice from in-house counsel (Fox, Mary/Esq.) regarding policy committee meeting agenda. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6028 | | 9/28/2017 | Norton, Rita | Tallamy, Brad | Norton, Rita | | Email with attachments among client employees discussing information prepared at the direction of the ABC Legal Department regarding opioid task force. | Attorney-Client Privilege | Specific attorney not identified and/or attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |

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| ABDCMDL_PRIV_6029 | | 9/28/2017 | Norton, Rita | Mitchell, B. | Norton, Rita; Heller, Stacie; Tallamy, Brad | | Email with attachments among client employees discussing information prepared at the direction of the ABC Legal Department regarding government affairs policy. | Attorney-Client Privilege | Specific attorney not identified and/or attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6030 | | 10/2/2017 | Norton, Rita | Mitchell, B. | Norton, Rita; Tallamy, Brad; Heller, Stacie | O'Sullivan, Ashley | Email with attachments among client employees discussing information prepared at the direction of the ABC Legal Department regarding government affairs policy. | Attorney-Client Privilege | Specific attorney not identified and/or attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6031 | | 10/2/2017 | Norton, Rita | Mitchell, B. | Heller, Stacie; Norton, Rita; Tallamy, Brad | O'Sullivan, Ashley | Email among client employees discussing information prepared at the direction of the ABC Legal Department regarding government affairs policy. | Attorney-Client Privilege | Specific attorney not identified and/or attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6032 | | 10/2/2017 | Norton, Rita | Mitchell, B. | Benske, John | Heller, Stacie; Norton, Rita | Email with attachments among client employees discussing information prepared at the direction of the ABC Legal Department regarding government affairs strategy. | Attorney-Client Privilege | Specific attorney not identified and/or attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6033 | | 10/2/2017 | Norton, Rita | Benske, John | Mitchell, B. | Heller, Stacie; Norton, Rita | Email among client employees discussing information prepared at the direction of the ABC Legal Department regarding government affairs strategy. | Attorney-Client Privilege | Specific attorney not identified and/or attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6034 | | 10/5/2017 | Norton, Rita | Mitchell, B. | White, Joel/Horizon DC; Irizarry, Steven/Roberti Global | Norton, Rita; Tallamy, Brad; Heller, Stacie; O'Sullivan, Ashley | Email among client employees and consultant discussing need for legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding Senate committee opioid hearings. | Attorney-Client Privilege | Privilege claim is inconsistent w/ prior discovery rulings. Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6035 | | 10/8/2017 | Norton, Rita | Norton, Rita | Mitchell, B.; Tallamy, Brad; Heller, Stacie | | Email with attachments among client employees discussing legal advice from NACDS counsel (Nicholson, Kevin/NACDS/Esq.) regarding public policy priorities for curbing opioid related dependence, overdose and death. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6039 | | 10/9/2017 | Norton, Rita | Norton, Rita | Weissman, Gabriel | Heller, Stacie; Tallamy, Brad; Clark, Gina; Moyer, Lauren; Campbell, Elizabeth/Esq.; Zimmerman, Chris | Email from client to in-house counsel discussing legal advice regarding Washington Post article. | Attorney-Client Privilege | Large distribution indicates that communication is not privileged. Counsel is merely copied on communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6040 | | 10/10/2017 | Norton, Rita | Romero, Lauren | Weissman, Gabriel; Campbell, Elizabeth/Esq.; Norton, Rita; Webb, Matthew; Schultz, Andrew; Clark, Gina; Moyer, Lauren | Putt, Jordan | Email with attachment from client to in-house counsel seeking legal advice regarding proposed controlled substance social media strategy. | Attorney-Client Privilege | Large distribution indicates that communication is not privileged. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6041 | | 10/11/2017 | Norton, Rita | Mitchell, B. | Norton, Rita | Tallamy, Brad | Email with attachments among client employees discussing need for legal advice from in-house counsel (Casalenuovo, Chris/Esq.) regarding NACDS policy meeting. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6043 | | 10/11/2017 | Norton, Rita | Norton, Rita | Benske, John; Mitchell, Beth | Heller, Stacie; Tallamy, Brad; O'Sullivan, Ashley | Email among client employees discussing strategy at the direction of in-house counsel (Campbell, Elizabeth/Esq.) regarding proposed opioid crisis social media outreach. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6044 | | 10/11/2017 | Norton, Rita | Norton, Rita | Tallamy, Brad; Heller, Stacie; Mitchell, B.; O'Sullivan, Ashley; Benske, John | | Email among client employees discussing legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding controlled substance social media policy. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |

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| ABDCMDL_PRIV_6075 | | 10/17/2017 | Norton, Rita | Parker, John/HDA | Weissman, Gabriel; Barry, Ellen/CAH; Chasen, Kristin/McKesson; Slone, P./McKesson; Ganley, Joe/McKesson; Callinicos, Sean/CAH; McGrath, Rebecca/CAH; Norton, Rita; Tallamy, Brad; Nelson, Jennifer/McKesson | Miller, Ruth/HDA; Kelly, Patrick/HDA; Gallenagh, Elizabeth/Esq./HDA; Freitas, Kristen/HDA; Simonett, Farah/HDA DiLoreto, Matthew/HDA; Kozyckyj, Roxolana/HDA; Krusing, Clare/Reservoir; Schooling, Robert/Reservoir; Ward, Mallory/Reservoir | Email with attachments among trade group, distributors and client employees discussing information prepared at the direction of the ABC Legal Department regarding draft media response. | Attorney-Client Privilege; Common interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472747 |
| ABDCMDL_PRIV_6081 | | 10/18/2017 | Norton, Rita | Freitas, Kristen/HDA | Ganley, Joe/McKesson; Slone, Pete/McKesson; Norton, Rita; Tallamy, Brad; Mitchell, B.; McGrath, R./CAH; Callinicos, Sean/CAH | Gallenagh, Elizabeth/Esq./HDA; Miller, Ruth/HDA; Cosgrove, Jewelyn/HDA; Downs, Raissa/TDY Consulting; Young, Jennifer/TDY Consulting; Smith, Pamela/TDY Consulting; Menn, Buddy/Brown Rudnick; Thorsen, Carl/French; French, Alec/French | Email with attachment among client employees, consultants, trade group and distributors seeking legal advice regarding draft letter for elected officials. | Attorney-Client Privilege; Common interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472755 |
| ABDCMDL_PRIV_6082 | | 10/18/2017 | Norton, Rita | Freitas, Kristen/HDA | Ganley, Joe/McKesson; Slone, Pete/McKesson; Norton, Rita; Tallamy, Brad; Mitchell, B.; McGrath, R./CAH; Callinicos, Sean/CAH | Gallenagh, Elizabeth/Esq./HDA; Miller, Ruth/HDA; Cosgrove, Jewelyn/HDA | Email with attachment among client employees, trade group and distributors discussing need for legal advice from the ABC Legal Department regarding change to Senate bill. | Attorney-Client Privilege; Common interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472757 |
| ABDCMDL_PRIV_6083 | | 10/18/2017 | Norton, Rita | Krusing, Clare/Reservoir | Parker, John/HDA; Weissman, Gabriel; Barry, Ellen/CAH; Chasen, Kristin/McKesson; Slone, P./McKesson; Ganley, Joe/McKesson; Callinicos, Sean/CAH; McGrath, Rebecca/CAH; Norton, Rita; Tallamy, Brad; Nelson, Jennifer/McKesson | Miller, Ruth/HDA; Kelly, Patrick/HDA; Gallenagh, Elizabeth/Esq./HDA; Freitas, Kristen/HDA; Simonett, Farah/HDA DiLoreto, Matthew/HDA; Kozyckyj, Roxolana/HDA; Krusing, Clare/Reservoir; Schooling, Robert/Reservoir; Ward, Mallory/Reservoir | Email with attachment among consultant, outside counsel, client employees, trade group and distributors discussing need for legal advice regarding revised language for Senate bill. | Attorney-Client Privilege; Common interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472762 |
| ABDCMDL_PRIV_6091 | | 10/18/2017 | Norton, Rita | Freitas, Kristen/HDA | Callinicos, Sean/CAH; McGrath, R./CAH; Slone, P./McKesson; Ganley, Joe/McKesson; Norton, Rita; Tallamy, Brad | Gallenagh, Elizabeth/Esq./HDA; Cosgrove, Jewelyn/HDA; Miller, Ruth | Email among trade group, distributors and client employees discussing information prepared at the direction of the ABC Legal Department regarding response to letter from elected official. | Attorney-Client Privilege; Common interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472766 |
| ABDCMDL_PRIV_6092 | | 10/18/2017 | Norton, Rita | Simpson, Al/Mercury, LLC | Norton, Rita | | Email with attachments from consultant to client discussing need for legal advice from outside counsel (Graefe, Frederick/Esq./Graefe Law) regarding proposed changes to Senate bill. | Attorney-Client Privilege | Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6093 | | 10/18/2017 | Norton, Rita | Mitchell, B. | Norton, Rita; Tallamy, Brad | | Email among client employees discussing need for legal advice from outside counsel (Graefe, Frederick/Esq./Graefe Law) regarding proposed changes to Senate bill. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6105 | | 10/20/2017 | Norton, Rita | Ganley, Joseph/McKesson | Kelly, Patrick/HDA; Drew, Gregory/Value Drug; Harrison, Hal/Mutual Drug; Foreman, Jeffrey/Smith Drug; Smith, C./HD Smith; Norton, Rita; Callinicos, Sean/CAH; Slone, Pete/McKesson | Loveno, Patrick/Value Drug; Kotechno, Kaushik/Smith Drug; Heller, Stacie; Mitchell, B.; Kozyckyj, Roxolana/HDA; Gallenagh, Elizabeth/Esq./HDA; DiLoreto, Matthew/HDA; Freitas, Kristen/HDA; Miller, Ruth/HDA; Gray, John/HDA; Parker, John/HDA; McGrath, Rebecca/CAH | Email with attachment from distributor to outside counsel, distributors and trade group seeking legal advice regarding draft HDA solutions document. | Attorney-Client Privilege; Common interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472769 |
| ABDCMDL_PRIV_6106 | | 10/20/2017 | Norton, Rita | Ganley, Joseph/McKesson | Kelly, Patrick/HDA; Drew, Gregory/Value Drug; Harrison, Hal/Mutual Drug; Foreman, Jeffrey/Smith Drug; Smith, C./HD Smith; Norton, Rita; Callinicos, Sean/CAH; Slone, Pete/McKesson | Loveno, Patrick/Value Drug; Kotechno, Kaushik/Smith Drug; Heller, Stacie; Mitchell, B.; Kozyckyj, Roxolana/HDA; Gallenagh, Elizabeth/Esq./HDA; DiLoreto, Matthew/HDA; Freitas, Kristen/HDA; Miller, Ruth/HDA; Gray, John/HDA; Parker, John/HDA; McGrath, Rebecca/CAH | Email with attachment from distributor to outside counsel, distributors and trade group seeking legal advice regarding draft HDA solutions document. | Attorney-Client Privilege; Common interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472783 |

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| ABDCMDL_PRIV_6107 | | 10/20/2017 | Norton, Rita | Smith, Chris/HD Smith | Ganley, Joseph/McKesson | Kelly, Patrick/HDA; Drew, Gregory/Value Drug; Harrison, Hal/Mutual Drug; Foreman, Jeffrey/Smith Drug; Norton, Rita; Callinicos, Sean/CAH; Slone, Pete/McKesson; Lavella, Patrick/Value Drug; Kotecha, Kaushik/Smith Drug; Heller, Stacie; Mitchell, B.; Kozyckyj, Roxolana/HDA; Gallenagh, Elizabeth/Esq./HDA; DiLoreto, Matthew/HDA; Freitas, Kristen/HDA; Miller, Ruth; Gray, John/HDA; Parker, John/HDA; McGrath, R./CAH | Email from client to outside counsel and distributors seeking legal advice regarding draft HDA solutions document. | Attorney-Client Privilege; Common interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472785 |
| ABDCMDL_PRIV_6136 | | 10/24/2017 | Norton, Rita | Kelly, Patrick/HDA | Drew, Gregory/Value Drug; Harrison, Hal/Mutual Drug; Foreman, Jeff/Smith Drug; Smith, C./HD SMITH; Norton, Rita; Callinicos, Sean/CAH; Slone, Pete/McKesson | Ganley, Joe/McKesson; Lavella, Patrick/Value Drug; Kotecha, Kaushik/Smith Drug; Heller, Stacie; Mitchell, B.; Kozyckyj, Roxolana/HDA; Gallenagh, Elizabeth/Esq./HDA; DiLoreto, Matthew/HDA; Freitas, Kristen/HDA; Miller, Ruth/HDA; Gray, John/HDA; Parker, John/HDA; McGrath, Rebecca/CAH; Tallamy, Brad; Frank, Richard/Esq./OFW Law; Pahl, T./Esq/OFW Law; Ritter, Pam/HDA | Email with attachments from trade group to outside counsel, distributors and consultant seeking legal advice regarding HDA practical solutions document. | Attorney-Client Privilege; Common interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472836 |
| ABDCMDL_PRIV_6189 | | 12/5/2017 | Norton, Rita | Freitas, Kristen/HDA | Norton, Rita; Tallamy, Brad; Slone, P./McKesson; Ganley, Joe/McKesson; Brandewie, Claire/McKesson; O'Sullivan, Ashley; Mitchell, B.; Callinicos, Sean/CAH; McGrath, R./CAH; Brimmer, Molly/CAH | Gallenagh, Elizabeth/Esq./HDA; Kelly, Patrick/HDA; Cosgrove, Jewelyn/HDA | Email among client employees, outside counsel, trade group and distributors discussing need for legal advice regarding strategy for upcoming Congressional hearings. | Attorney-Client Privilege; Common interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472842 |
| ABDCMDL_PRIV_6209 | | 12/20/2017 | Norton, Rita | Mitchell, B. | Slone, Pete/McKesson | Freitas, Kristen/HDA; Brandewie, Claire/McKesson; Norton, Rita; Tallamy, Brad; Mitchell, Beth; Brimmer, Molly/CAH; Menn, Buddy/Esq./Brown Rudnick | Email from client to consultant and distributors discussing information at the direction of the ABC Legal Department regarding the Hassan meeting on the opioid crisis. | Attorney-Client Privilege; Common interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472843 |
| ABDCMDL_PRIV_6232 | | 2/27/2018 | Norton, Rita | Freitas, Kristen/HDA | Norton, Rita | | Email from trade group to client discussing legal advice sought from in-house counsel (Campbell, Elizabeth/Esq.) regarding federal legislation | Attorney-Client Privilege; Common interest | Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472878 |
| ABDCMDL_PRIV_6240 | | 3/3/2018 | Norton, Rita | Freitas, Kristen/HDA | Callinicos, Sean/CAH; Norton, Rita; Rebecca McGrath, Rebecca/CAH; Slone, Pete; Ganley, Joe/McKesson; Brandewie, Claire/McKesson; Tallamy, Brad; Mitchell, Beth | Downs, Raissa/TDY; Young, Jennifer/TDY; Ivancic, C./TDY; Smith, Pamela/TDY Consulting; Murray, E./TDY; Thorsen, Carl/Thorsen-French; French, Alec/French; Menn, Buddy/Esq./Brown Rudnick; Gallenagh, Elizabeth/Esq./HDA; Kelly, Patrick/HDA; Miller, Ruth | Email with attachments from trade group to outside counsel, consultants and distributors seeking legal advice regarding DOJ letter. | Attorney-Client Privilege; Common interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472880 |
| ABDCMDL_PRIV_6241 | | 3/4/2018 | Norton, Rita | Freitas, Kristen/HDA | Callinicos, Sean/CAH; Norton, Rita; Rebecca McGrath, Rebecca/CAH; Slone, Pete; Ganley, Joe/McKesson; Brandewie, Claire/McKesson; Tallamy, Brad; Mitchell, Beth | Downs, Raissa/TDY; Young, Jennifer/TDY; Ivancic, C./TDY; Smith, Pamela/TDY Consulting; Murray, E./TDY; Thorsen, Carl/Thorsen-French; French, Alec/French; Menn, Buddy/Esq./Brown Rudnick | Email from trade group to outside counsel, distributors and consultant seeking legal advice regarding DOJ letter | Attorney-Client Privilege; Common interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00472884 |
| ABDCMDL_PRIV_6250 | | 3/13/2018 | Norton, Rita | Freitas, Kristen/HDA | Callinicos, Sean/CAH; McGrath, R./CAH; Norton, Rita; Tallamy, Brad; Slone, P./McKesson; Ganley, Joe/McKesson | Gallenagh, Elizabeth/Esq./HDA; Kelly, Patrick/HDA; Cosgrove, Jewelyn/HDA; Miller, Ruth/HDA | Email from trade group to counsel and distributors regarding proposed modifications to S. 483. | Attorney-Client Privilege; Common interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00473142 |

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| ABDCMDL_PRIV_6252 | | 3/14/2018 | Norton, Rita | Reese, Linda | Tallamy, Brad; Norton, Rita; Meehan, Fallon | O'Sullivan, Ashley | Email among client employees discussing legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding feedback for House Ways and Means Committee on solutions to opioid epidemic. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6256 | | 3/15/2018 | Norton, Rita | Rosenbloom, Alan/Senior Care Pharmacies | Gaycohealthcare; Mitchell, Beth; Bill Maguire, Bill/OmniCell; Rowland, Bob/Grane RX; Warnock, Robert/Pruitthealth; Weir, Bob Guardian Pharmacy; Scott, Brian/Kinneydrugs; Brian Kramer, Brian/Forumpharmacy; Lewis, Dave/Consonus; Farber, David/Esq./KS Law; Towns, Doug/Guardian pharmacy; Nishi, Karen/Cubexsystem; Garza, Kim/Innovatix; Avdiu, Labi; Connor, Lynn/SCP-Rx; Ludlow, Mary/Wopharmacy; Templin, Michelle/MHA; Brattain, Patty/PharMerica; McKeon, Rich/McKesson; Miller, Rick; Norton, Rita; Hancock, Scott/PropacPayless Pharmacy; Thayer, Scott; Siegel, Shara/Innovatix; Rhodus, Susan/GeriMed; Voelkl, Todd/Bufalo Pharmacies; Caneris, Tom/PharMerica; Galletta, Vince/Bufalo Pharmacies | | Email with attachment from pharmacy to outside counsel and client seeking legal advice regarding opioid legislation. | Attorney-Client Privilege; Common Interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6329 | | 5/2/2018 | Norton, Rita | Norton, Rita | Gallenagh, Elizabeth/Esq./HDA | Callinicos, Sean/CAH; Slone, Pete/McKesson; Kelly, Patrick/HDA; Freitas, Kristen/HDA; Miller, Ruth/HDA | Email from client to outside counsel, distributors and trade group seeking legal advice regarding Energy and Commerce Committee hearing. | Attorney-Client Privilege; Common interest | Large distribution indicates lack of privilege. Third party involvement destroys privilege. Subject of communication involves a business matter. Attorney involvement is indirect and/or not apparent. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00473146 |
| ABDCMDL_PRIV_6376 | | 4/23/2010 | Due Diligence Files | Tomkiewicz, Joe | Hazewski, Edward | | Email reflecting legal advice sought from counsel (Johnson, Scott/Esq.; Chou, John/Esq.) regarding Acme #30 drug diversion investigation. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6377 | | 6/24/2013 | Due Diligence Files | | | | Draft communication attached to privileged email seeking legal advice from counsel (Greenhall, Richard/Esq.; Nachman, Michael/Esq.) regarding low volume, high risk accounts. | Attorney-Client Privilege | No author identified. No recipients identified. Subject involves a business/regulatory matter, not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation. Draft document sent to in-house counsel seeking legal review and analysis as attachment to ABDCMDL_PRIV6379.. |
| ABDCMDL_PRIV_6378 | | 6/24/2013 | Due Diligence Files | | | | Draft talking points attached to privileged email seeking legal advice from counsel (Greenhall, Richard/Esq.; Nachman, Michael/Esq.) regarding low volume, high risk accounts. | Attorney-Client Privilege | No author identified. No recipients identified. Subject involves a business/regulatory matter, not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation. Draft document sent to in-house counsel seeking legal review and analysis as attachment to ABDCMDL_PRIV6379. |
| ABDCMDL_PRIV_6392 | ABDCMDL00037421 | 12/16/2009 | AmerisourceBergen | Michael Mapes (CSRA DEA Consultant) | | | Report prepared at the direction of counsel (Debra Swartz, Esq. - VP & Associate General Counsel) providing information to assist with the rendering of legal advice re Order Monitoring Program Review. | Attorney-Client Privilege | Third party involvement destroys privilege. Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00398875 |

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| ABDCMDL_PRIV_6393 | ABDCMDL00037421 | 11/8/2010 | AmerisourceBergen | Michael Mapes (CSRA DEA Consultant) | Debra Swartz, Esq. (VP & Associate General Counsel) | Chris Zimmerman (VP - CSRA & Chief Compliance Officer); Steve Mays (Director - Regulatory Affairs); Ed Hazewski (Manager - CSRA II) | Report prepared at the direction of counsel (Debra Swartz, Esq. - VP & Associate General Counsel) providing information to assist with the rendering of legal advice re Order Monitoring Program Review. | Attorney-Client Privilege | Third party involvement destroys privilege. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00398877 |
| ABDCMDL_PRIV_6394 | ABDCMDL00037421 | 1/6/2011 | AmerisourceBergen | Ed Hazewski (Manager - CSRA II) | Debra Swartz, Esq. (VP & Associate General Counsel) | Chris Zimmerman (VP - CSRA & Chief Compliance Officer); Steve Mays (Director - Regulatory Affairs); Paul Ross (Director - Regulatory Affairs) | Response to report prepared at the direction of counsel (Debra Swartz, Esq. - VP & Associate General Counsel) providing information to assist with the rendering of legal advice re Order Monitoring Program Review. | Attorney-Client Privilege | Subject of communication involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00398880 |
| ABDCMDL_PRIV_6395 | ABDCMDL00037421 | 7/27/2012 | AmerisourceBergen | Michael Mapes (CSRA DEA Consultant) | Elizabeth Campbell, Esq. (Assistant General Counsel) | | Report prepared at the direction of counsel (Elizabeth Campbell, Esq. - Assistant General Counsel) providing information to assist with the rendering of legal advice re Order Monitoring Program Review. | Attorney-Client Privilege | Subject of communication involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00398882 |
| ABDCMDL_PRIV_6396 | ABDCMDL00037421 | 11/26/2012 | AmerisourceBergen | Ed Hazewski (Director - Diversion Control & Security) | Elizabeth Campbell, Esq. (Assistant General Counsel) | Chris Zimmerman (VP - CSRA & Chief Compliance Officer); Steve Mays (Director - Regulatory Affairs); Joe Tomkiewicz (Corporate Investigator I); Michael Mapes (CSRA DEA Consultant) | Response to report prepared at the direction of counsel (Elizabeth Campbell, Esq. - Assistant General Counsel) providing information to assist with the rendering of legal advice re Order Monitoring Program Review. | Attorney-Client Privilege | Subject of communication involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00398886 |
| ABDCMDL_PRIV_6397 | ABDCMDL00037421 | 8/9/2013 | AmerisourceBergen | Ed Hazewski (Director - Diversion Control & Security) | Mary Fox, Esq. (VP - Deputy General/Group Counsel); Chris Zimmerman (VP - CSRA & Chief Compliance Officer) | Steve Mays (Director - Regulatory Affairs); Elizabeth Campbell, Esq. (Assistant General Counsel) | Report prepared at the direction of counsel (Mary Fox, Esq. - VP - Deputy General/Group Counsel; Elizabeth Campbell, Esq. - Assistant General Counsel) providing information to assist with the rendering of legal advice re Order Monitoring Program Review. | Attorney-Client Privilege | Subject of communication involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00398888 |
| ABDCMDL_PRIV_6398 | ABDCMDL00037421 | 11/1/2013 | AmerisourceBergen | Ed Hazewski (Director - Diversion Control & Security) | Elizabeth Campbell, Esq. (VP & Associate General Counsel); Chris Zimmerman (VP - CSRA & Chief Compliance Officer) | Steve Mays (Director - Regulatory Affairs); Joe Tomkiewicz (Corporate Investigator I); Michael Mapes (CSRA DEA Consultant) | Response to report prepared at the direction of counsel (Elizabeth Campbell, Esq. - VP & Associate General Counsel) providing information to assist with the rendering of legal advice re Order Monitoring Program Review. | Attorney-Client Privilege | Subject of communication involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00398892 |
| ABDCMDL_PRIV_6399 | ABDCMDL00037421 | 7/27/2014 | AmerisourceBergen | Michael Mapes (CSRA DEA Consultant) | Elizabeth Campbell, Esq. (VP & Associate General Counsel); | Chris Zimmerman (VP - CSRA & Chief Compliance Officer); Steve Mays (Director - Regulatory Affairs); David May (Sr. Director - Diversion Control & Federal Investigations); Ed Hazewski (Director - Diversion Control & Security) | Report prepared at the direction of counsel (Elizabeth Campbell, Esq. - VP & Associate General Counsel) providing information to assist with the rendering of legal advice re Order Monitoring Program Review. | Attorney-Client Privilege | Subject of communication involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00398896 |
| ABDCMDL_PRIV_6400 | ABDCMDL00037421 | 1/31/2017 | AmerisourceBergen | Brian Reise (CSRA DEA Consultant) | Elizabeth Campbell, Esq. (SVP - Group General Counsel) | Chris Zimmerman (VP - CSRA & Chief Compliance Officer); Steve Mays (Director - Regulatory Affairs); David May (Sr. Director - Diversion Control & Federal Investigations) | Report prepared at the direction of counsel (Elizabeth Campbell, Esq. - SVP - Group General Counsel) providing information to assist with the rendering of legal advice re Order Monitoring Program Review. | Attorney-Client Privilege | Subject of communication involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC subsequently produced the document identified in this entry at ABDCMDL00476531 |
| ABDCMDL_PRIV_6406 | | 1/11/2014 | Mauch, Robert | Mauch, Robert | Collis, Steve; Neu, Dave | Chou, John/Esq.; Howell, Peyton; Norton, Rita; Zimmerman, Chris; Caffentzis, Anthony; Guttman, Tim | Email from client to in-house counsel seeking legal advice regarding NABP consensus statement. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6411 | | 9/23/2014 | Mauch, Robert | Mauch, Robert | Bennett, Bruce | | Email with attachments from client to in-house counsel (Fox, Mary/Esq.) seeking legal advice regarding CSRA audit of distribution center. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |

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| ABDCMDL_PRIV_6419 | | 5/8/2015 | Mauch, Robert | Madsen, Greg | Fox, Mary/Esq. | Collis, Steve; Mauch, Robert; Ball, Chuck; Schmidt, Andrew; Zimmerman, Chris; Miller, Mike; Williamson, Joe; Garland, Mike; Fisher, Marian | Email with attachments from client to in-house counsel seeking legal advice regarding CSRA audit of distribution center. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6436 | | 6/22/2015 | Mauch, Robert | Chou, John/Esq. | Marsh, Lawrence; Guttman, Tim; Barry, June; Clark, Gina; Danilewitz, Dale; Bausinger, Vicki/Legal Department; Zimmerman, Chris; Greenhall, Richard/Esq.; Fox, Mary/Esq.; Gaddes, Kathy; Stone, Rob/Esq.; Campbell, Elizabeth/Esq.; Davey, Vanessa; Ouchley, Jeremy/Esq.; Krikorian, Laz; Nguyen, Thanh; Mauch, Robert; Frary, James; Howell, Peyton; Senior, David | | Email with attachments from in-house counsel to client providing legal advice regarding CSRA FY16 Plan. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation. Communication circulates legal strategy and advice from ABDC Legal Department. |
| ABDCMDL_PRIV_6437 | | 6/22/2015 | Mauch, Robert | Mauch, Robert | Brungess, Barbara | | Email from client discussing legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding HDMA Executive Committee Meeting. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6443 | | 7/8/2015 | Mauch, Robert | Mansfield, Denise | DeMartino, John; Byrne, Thomas; Mauch, Robert; Cherveney, Eric; Ball, Chuck; Gaal, Greg; Caffentzis, Anthony; Wetzel, Tim; Jackson, Jim; Senior, David; Lightfoot, Emily; Miller, Mike; Zimmerman, Chris; Wiggs, John; Caroline, David/Esq.; Manning, Kathie; Greenhall, Richard/Esq.; Campbell, Elizabeth/Esq.; Meluso, Ginette; Mays, Steve; Chou, John/Esq.; May, David; Winter, Matthew; Nachman, Michael/Esq.; Bennett, Bruce; Cox, Kate; Duncan, Francine; Hendrickson, Stephen; Bak, Hyung/Esq. | | Email with attachments from client to in-house counsel seeking legal advice regarding PMO. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business/regulatory matter, and not a legal one. Description is overly vague. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6449 | | 7/20/2015 | Mauch, Robert | Chou, John/Esq. | Brungess, Barbara; Mauch, Robert | Campbell, Elizabeth/Esq. | Email from in-house counsel to client providing legal advice regarding HDMA public relations. | Attorney-Client Privilege | Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6453 | | 7/20/2015 | Mauch, Robert | Mauch, Robert | Gray, John/HDMA | Meehan, Fallon | Email from client discussing legal advice from in-counsel (Bak, Hyung/Esq.) regarding HDMA public relations. | Attorney-Client Privilege | Third party involvement destroys privilege. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6454 | | 7/24/2015 | Mauch, Robert | Madsen, Greg | Fox, Mary/Esq. | Collis, Steve; Mauch, Robert; Schmidt, Andrew; Zimmerman, Chris; Mays, Steve; Ball, Chuck; Bennett, Bruce; Rehovsky, Jeffery; Brown, Greg; Olmo, Marisol | Email with attachments from client to in-house counsel seeking legal advice regarding CSRA audit of distribution center. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business/regulatory matter, and not a legal one. Description is overly vague. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6455 | | 7/31/2015 | Mauch, Robert | Taraschi, Anthony | Fox, Mary/Esq. | Collis, Steve; Mauch, Robert; Schmidt, Andrew; Zimmerman, Chris; Mays, Steve; Ball, Chuck; Bennett, Bruce; Rehovsky, Jeffery; Cook, Brent; Walker, Jeff | Email with attachments from client to in-house counsel seeking legal advice regarding CSRA audit of distribution center. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business/regulatory matter, and not a legal one. Description is overly vague. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6457 | | 8/18/2015 | Mauch, Robert | Droz, Antonio | Mauch, Robert | | Email chain with attachments between client and in-house counsel (Fox, Mary/Esq.) discussing legal advice regarding CSRA audit of distribution center. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |

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| ABDCMDL_PRIV_6466 | | 1/18/2016 | Mauch, Robert | Mauch, Robert | Gray, John/HDMA; Smith, Dale/HD Smith; Moody, David/Mutual Drug; Giacomini, Jon/Cardinal; Couch, Ken; Walchirk, Mark/McKesson; Scherr, Ted/Dak Drug | Voeller, Jan/Dak Drug; Gabay, Kim/Cardinal; Mariano, Karleen/McKesson; Meehan, Fallon; Tara Conway, Tara; Watson, Jessica/Mutual Drug | Email from client discussing legal advice from in-house counsel (Campbell, Elizabeth/Esq.) regarding Masters Pharmaceuticals case. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Third party involvement destroys privilege. Subject involves a business/regulatory matter, and not a legal one. Description is overly vague. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6473 | | 4/4/2016 | Mauch, Robert | Gallenagh, Elizabeth/Esq./HD MA | Gallenagh, Elizabeth/Esq./HDMA | Gray, John/HDMA | Email with attachments from in-house counsel to client providing legal advice regarding Masters Pharmaceuticals case. | Attorney-Client Privilege; Work Product | Third party involvement destroys privilege. Subject involves a business/regulatory matter, and not a legal one. Description is overly vague. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6474 | | 4/29/2016 | Mauch, Robert | Gray, John/HDMA | Thomas, Al/Sanofi Pasteur; Mauch, Robert; Boyter, Dawn/Glasgow KY; Gielen, Chad/LWDRX; Phillips, Chip/Andanet; Smith, Dale; MacFarlane, Dave/SeaCoast Medical; Ferraro, Louis/Henry Schien; Gray, John/HDMA; Drew, Greg/Value Drug; Foreman, Jeff/Smith Drug; Johnston, Gayle/Cura Script; Giacomini, Jon/Cardinal; Couch, Ken; Lazich, Sam/DMS Pharma; Rodriguez, Lenny/Attain Med; Burns, Maria/Burlington Drug; Walchirk, Mark/McKesson; Smith, Mary/RS Northeast; Faul, Michael/Miami Luken; Dickson, Paul; Rodriguez, Raul/Drogueria Betances; Richards, GK; Scherr, Ted/Dak Drug; Schoen, Chris/Prescription Supply; Franklin, Scott/Toprx; Shikany, Walter/Health Coalition; Smock, Nick/PBA Health; Szwec, Todd/Keysource Medical | | Email attaching memorandum from outside counsel (Hyman Phelps and McNamara) discussing legal advice regarding Public Law 114-145 (S.483). | Attorney-Client Privilege; Work Product | Large distribution indicates that privilege does not apply. Third party involvement destroys privilege. Subject involves a business/regulatory matter, and not a legal one. Description is overly vague. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6481 | | 5/27/2016 | Mauch, Robert | Clark, Gina | Moyer, Lauren | May, David; Weissman, Gabriel; Brungess, Barbara; Campbell, Elizabeth/Esq.; Mauch, Robert; Chou, John/Esq.; Norton, Rita | Redacted email chain among client employees and in-house counsel (Campbell, Elizabeth/Esq.; Chou, John/Esq.) discussing legal strategy regarding responses to media reporting and inquiries. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication to/from in-house counsel is privileged as it related to provision of legal advice. Description revised to reflect same. |
| ABDCMDL_PRIV_6482 | | 5/31/2016 | Mauch, Robert | Moyer, Lauren | Clark, Gina; May, David; Weissman, Gabriel; Brungess, Barbara; Campbell, Elizabeth/Esq.; Mauch, Robert; Chou, John/Esq.; Norton, Rita | | Email chain with attachments between client and in-house counsel discussing legal advice regarding Lexington Herald Leader article. | Attorney-Client Privilege; Work Product | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6486 | | 6/16/2016 | Mauch, Robert | Altrogge, Jeannine | Hua, Wen; Combs, Steve; Guttman, Tim; Norton, Rita; Davis, Laura; Peters, Michael; Barry, June; Chou, John/Esq.; Clark, Gina; Danilewitz, Dale | Krikorian, Laz; Senior, David; Frary, James; Morales, Albert; Howell, Peyton; Cleary, Jim; Marsh, Lawrence; Mauch, Robert | Email with attachments from client to in-house counsel seeking legal advice regarding Government Affairs presentation. | Attorney-Client Privilege; Work Product | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Description is overly vague. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6490 | | 6/22/2016 | Mauch, Robert | Zimmerman, Chris | Brungess, Barbara | Campbell, Elizabeth/Esq.; Weissman, Gabriel; Moyer, Lauren; May, David; Clark, Gina; Chou, John/Esq.; Guttman, Tim; Mauch, Robert; Norton, Rita | Redacted email from in-house counsel (Campbell, Elizabeth/Esq.) providing legal advice regarding response to media inquiry. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Attorney involvement appears indirect. Subject involves a business matter, and not a legal one. Description is overly vague. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication from in-house counsel is privileged as it contains legal advice. Description revised to reflect same. |

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| ABDCMDL_PRIV_6500 | | 6/30/2016 | Mauch, Robert | Madsen, Greg | Campbell, Elizabeth/Esq. | Collis, Steve; Mauch, Robert; Schmidt, Andrew; Zimmerman, Chris; Mays, Steve; Ball, Chuck; Bennett, Bruce; Delac, Frank; DiCenso, Frank; Hamilton, Greg; Taraschi, Anthony; Ford, Stephanie | Email with attachments from client to in-house counsel seeking legal advice regarding CSRA audit of distribution center. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6504 | | 8/11/2016 | Mauch, Robert | Madsen, Greg | Campbell, Elizabeth/Esq. | Collis, Steve; Mauch, Robert; Schmidt, Andrew; Zimmerman, Chris; Mays, Steve; Ball, Chuck; Bennett, Bruce; Delac, Frank; Novak, Dawn; Taraschi, Anthony; Strelow, Nancy | Email with attachments from client to in-house counsel seeking legal advice regarding CSRA audit of distribution center. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6506 | | 9/12/2016 | Mauch, Robert | Madsen, Greg | Campbell, Elizabeth/Esq. | Collis, Steve; Mauch, Robert; Schmidt, Andrew; Zimmerman, Chris; Mays, Steve; Ball, Chuck; Miller, Mike; Wilson, Bill; McGuire, Shawn; Jessee, John; Grennon, Christy | Email with attachments from client to in-house counsel seeking legal advice regarding CSRA audit of distribution center. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6518 | | 10/27/2016 | Mauch, Robert | Chrisman, Kelly | Chou, John/Esq.; Clark, Gina; Collis, Steve; Danilewitz, Dale; Frary, James; Gaddes, Kathy; Guttman, Tim; Howell, Peyton; Cleary, Jim; Mauch, Robert; Park, Sun | Norton, Rita | Email with attachments from client to in-house counsel seeking legal advice regarding Government Affairs presentation. | Attorney-Client Privilege; Work Product | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6519 | | 10/27/2016 | Mauch, Robert | Weissman, Gabriel | Norton, Rita; May, David; Brungess, Barbara; Clark, Gina; Zimmerman, Chris; Chou, John/Esq.; Moyer, Lauren; Campbell, Elizabeth/Esq.; Guttman, Tim; Mauch, Robert; Heller, Stacie; Tallamy, Brad | | Redacted email chain among client and in-house counsel (Campbell, Elizabeth/Esq.; Chou, John/Esq.) seeking and providing regarding response to media inquiry. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication to/from in-house counsel is privileged as it related to provision of legal advice. Description revised to reflect same. |
| ABDCMDL_PRIV_6526 | | 11/1/2016 | Mauch, Robert | Weissman, Gabriel | Howell, Peyton; Zimmerman, Chris; Mauch, Robert | Clark, Gina; Norton, Rita; Campbell, Elizabeth/Esq.; Moyer, Lauren; Tallamy, Brad | Redacted email from client to in-house counsel seeking legal advice regarding messaging document. | Attorney-Client Privilege; Work Product | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication reflects request for legal advice from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_6527 | | 11/1/2016 | Mauch, Robert | Howell, Peyton | Weissman, Gabriel | Clark, Gina; Mauch, Robert; Norton, Rita; Campbell, Elizabeth/Esq.; Zimmerman, Chris; Tallamy, Brad; Pellicano, Debora; Moyer, Lauren | Email with attachments between client and in-house counsel discussing legal advice regarding HDA industry talking points. | Attorney-Client Privilege; Work Product | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6528 | | 11/5/2016 | Mauch, Robert | Weissman, Gabriel | Mauch, Robert | Chou, John/Esq.; Clark, Gina; Norton, Rita | Email chain with attachments between client and in-house counsel discussing legal advice regarding HDA industry talking points. | Attorney-Client Privilege; Work Product | Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6529 | | 11/6/2016 | Mauch, Robert | Chou, John/Esq. | Mauch, Robert | Clark, Gina | Email from in-house counsel to client discussing legal advice regarding role of wholesalers in distribution of controlled substances. | Attorney-Client Privilege | Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation. Email from in-house counsel and contains legal advice. Description revised to reflect same. |
| ABDCMDL_PRIV_6530 | | 11/6/2016 | Mauch, Robert | Weissman, Gabriel | Mauch, Robert; Chou, John/Esq. | Clark, Gina; Norton, Rita | Email chain with attachments between client and in-house counsel discussing legal advice regarding HDA industry talking points. | Attorney-Client Privilege; Work Product | Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document without redactions |
| ABDCMDL_PRIV_6531 | | 11/6/2016 | Mauch, Robert | Clark, Gina | Weissman, Gabriel | Mauch, Robert; Chou, John/Esq.; Norton, Rita | Email chain between client and in-house counsel discussing legal advice regarding HDA industry talking points. | Attorney-Client Privilege | Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document without redactions |
| ABDCMDL_PRIV_6532 | | 11/6/2016 | Mauch, Robert | Chou, John/Esq. | Campbell, Elizabeth/Esq.; Zimmerman, Chris; May, David | Weissman, Gabriel; Norton, Rita; Clark, Gina; Mauch, Robert | Redacted email chain between client and in-house counsel regarding ABDC efforts to prevent diversion. | Attorney-Client Privilege; Work Product | Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation. Redacted email contains legal advice from in-house counsel. Description revised to reflect same. |

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| ABDCMDL_PRIV_6533 | | 11/6/2016 | Mauch, Robert | Mauch, Robert | Weissman, Gabriel | Chou, John/Esq.; Clark, Gina; Norton, Rita | Email chain between client and in-house counsel discussing legal advice regarding HDA industry talking points. | Attorney-Client Privilege | Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6534 | | 11/7/2016 | Mauch, Robert | Chou, John/Esq. | Barry, Ellen/Cardinal; Morford, Craig/Cardinal; Schechter, Lori/McKesson; Weissman, Gabriel; Hunter, Kristin/McKesson; Callinicos, Sean/Cardinal; Clark, Gina; Norton, Rita | | Email chain between client and in-house counsel discussing legal advice regarding HDA industry talking points. | Attorney-Client Privilege | Third party involvement destroys privilege. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6535 | | 11/7/2016 | Mauch, Robert | Norton, Rita | Clark, Gina; Chou, John/Esq.; Mauch, Robert | | Email chain between client and in-house counsel discussing legal advice regarding HDA industry talking points. | Attorney-Client Privilege | Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6536 | | 11/7/2016 | Mauch, Robert | Clark, Gina | Norton, Rita; Chou, John/Esq.; Mauch, Robert | | Email chain between client and in-house counsel discussing legal advice regarding HDA industry talking points. | Attorney-Client Privilege | Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6537 | | 11/7/2016 | Mauch, Robert | Norton, Rita | Clark, Gina; Weissman, Gabriel; Chou, John/Esq. | Zimmerman, Chris; Campbell, Elizabeth/Esq.; May, David; Mauch, Robert | Redacted email chain between client and in-house counsel regarding ABDC efforts to prevent diversion. | Attorney-Client Privilege | Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation. Redacted email contains legal advice from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_6538 | | 11/7/2016 | Mauch, Robert | Clark, Gina | Comis, Steve; Guttman, Tim; Chou, John/Esq.; Danilewitz, Dale; Howell, Peyton; Park, Sun; Mauch, Robert; Frary, James; Cleary, Jim; Gaddes, Kathy | Clark, Gina | Email with attachments from client to in-house counsel seeking legal advice regarding HDA industry talking points. | Attorney-Client Privilege; Work Product | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6539 | | 11/7/2016 | Mauch, Robert | Chou, John/Esq. | Mauch, Robert | Clark, Gina; Norton, Rita | Email chain between client and in-house counsel discussing legal advice regarding HDA industry talking points. | Attorney-Client Privilege | Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6540 | | 11/14/2016 | Mauch, Robert | Madsen, Greg | Campbell, Elizabeth/Esq. | Collis, Steve; Mauch, Robert; Greene, Karen; Zimmerman, Chris; Mays, Steve; Russell, Tiffany; Ball, Chuck; Bennett, Bruce; Lawlor, Michael; Terrien, Tracy; Pszczolkowski, Andrew; Shute, Lorna | Email with attachments from client to in-house counsel seeking legal advice regarding CSRA audit of distribution center. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6545 | | 11/21/2016 | Mauch, Robert | Madsen, Greg | Campbell, Elizabeth/Esq. | Collis, Steve; Mauch, Robert; Greene, Karen; Zimmerman, Chris; Mays, Steve; Russell, Tiffany; Ball, Chuck; Miller, Mike; Wilson, Bill; Stavich, John; Neipp, Peter; Vilums, Brianne | Email with attachments from client to in-house counsel seeking legal advice regarding CSRA audit of distribution center. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6546 | | 11/29/2016 | Mauch, Robert | Madsen, Greg | Campbell, Elizabeth/Esq. | Collis, Steve; Mauch, Robert; Greene, Karen; Zimmerman, Chris; Mays, Steve; Russell, Tiffany; Ball, Chuck; Bennett, Bruce; Lawlor, Michael; Maniaci, Philip; Price, William; Taraschi, Anthony; Hinman, Julie | Email with attachments from client to in-house counsel seeking legal advice regarding CSRA audit of distribution center. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6547 | | 12/6/2016 | Mauch, Robert | Mauch, Robert | Ball, Chuck | | Email with attachments from client to in-house counsel (Campbell, Elizabeth/Esq.) seeking legal advice regarding CSRA audit of distribution center. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6548 | | 12/9/2016 | Mauch, Robert | Weissman, Gabriel | Mauch, Robert; Clark, Gina; Chou, John/Esq.; Guttman, Tim; Campbell, Elizabeth/Esq.; Norton, Rita; Zimmerman, Chris; May, David | Moyer, Lauren | Redacted email among client employees and in-house counsel (Campbell, Elizabeth/Esq.) discussing legal strategy regarding responses to media reporting and inquiries. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication reflects request for legal advice from in-house counsel. Description revised to reflect same. |

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| ABDCMDL_PRIV_6554 | | 12/22/2016 | Mauch, Robert | Weissman, Gabriel | Mauch, Robert; Clark, Gina; Chou, John/Esq.; Guttman, Tim; Norton, Rita; Campbell, Elizabeth/Esq.; Zimmerman, Chris; May, David | Putt, Jordan; Romero, Lauren; DeAtley, Danny; Kemper, Jennifer; Moyer, Lauren; Murphy, Bennett | Email with attachments from client to in-house counsel seeking legal advice regarding WV controlled substances media update. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6555 | | 12/23/2016 | Mauch, Robert | May, David | Norton, Rita; Weissman, Gabriel | Mauch, Robert; Clark, Gina; Chou, John/Esq.; Guttman, Tim; Campbell, Elizabeth/Esq.; Zimmerman, Chris; Putt, Jordan; Romero, Lauren; DeAtley, Danny; Kemper, Jennifer; Moyer, Lauren; Murphy, Bennett; Heller, Stacie; Tallamy, Brad | Email from client to in-house counsel seeking legal advice regarding WV controlled substances media update. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6556 | | 1/5/2017 | Mauch, Robert | Zimmerman, Chris | Weissman, Gabriel; Mauch, Robert; Chou, John/Esq.; Clark, Gina; Campbell, Elizabeth/Esq.; Meluso, Ginette | Guttman, Tim; Mattox, Keri; May, David; Moyer, Lauren; Meehan, Fallon; Norton, Rita; Heller, Stacie; Tallamy, Brad | Email with attachments from client to in-house counsel seeking legal advice regarding draft WV Op-Ed. | Attorney-Client Privilege; Work Product | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6560 | | 1/6/2017 | Mauch, Robert | Weissman, Gabriel | May, David; Mauch, Robert; Chou, John/Esq.; Clark, Gina; Campbell, Elizabeth/Esq.; Meluso, Ginette | Guttman, Tim; Mattox, Keri; Zimmerman, Chris; Moyer, Lauren; Meehan, Fallon; Norton, Rita; Heller, Stacie; Tallamy, Brad | Email chain with attachments between client and in-house counsel discussing legal advice regarding draft WV Op-Ed. | Attorney-Client Privilege; Work Product | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6568 | | 1/12/2017 | Mauch, Robert | Clark, Gina | Mauch, Robert | | Redacted email chain between client and in-house counsel (Campbell, Elizabeth/Esq.; Chou, John/Esq.) discussing legal strategy regarding response to media inquiry. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication to/from in-house counsel is privileged as it related to provision of legal advice. Description revised to reflect same. |
| ABDCMDL_PRIV_6569 | | 1/17/2017 | Mauch, Robert | Weissman, Gabriel | Mauch, Robert; Chou, John/Esq.; Campbell, Elizabeth/Esq.; Pirouz, Korey; Norton, Rita; Heller, Stacie; Tallamy, Brad | Clark, Gina; Guttman, Tim; Moyer, Lauren; Murphy, Bennett; Mattox, Keri; Zimmerman, Chris; May, David | Redacted email chain between client and in-house counsel (Campbell, Elizabeth/Esq.; Chou, John/Esq.) discussing legal strategy regarding response to media inquiry. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication to/from in-house counsel is privileged as it related to provision of legal advice. Description revised to reflect same. |
| ABDCMDL_PRIV_6570 | | 1/17/2017 | Mauch, Robert | Norton, Rita | Weissman, Gabriel | Mauch, Robert; Chou, John/Esq.; Campbell, Elizabeth/Esq.; Pirouz, Korey; Heller, Stacie; Tallamy, Brad; Clark, Gina; Guttman, Tim; Moyer, Lauren; Murphy, Bennett; Mattox, Keri; Zimmerman, Chris; May, David | Redacted email chain between client and in-house counsel (Campbell, Elizabeth/Esq.; Chou, John/Esq.) discussing legal strategy regarding response to media inquiry. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication to/from in-house counsel is privileged as it related to provision of legal advice. Description revised to reflect same. |
| ABDCMDL_PRIV_6571 | | 1/18/2017 | Mauch, Robert | Clark, Gina | Weissman, Gabriel | Mauch, Robert; Chou, John/Esq.; Campbell, Elizabeth/Esq.; Pirouz, Korey; Norton, Rita; Heller, Stacie; Tallamy, Brad; Guttman, Tim; Moyer, Lauren; Murphy, Bennett; Mattox, Keri; Zimmerman, Chris; May, David | Redacted email chain between client and in-house counsel (Campbell, Elizabeth/Esq.; Chou, John/Esq.) discussing legal strategy regarding response to media inquiry. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication to/from in-house counsel is privileged as it related to provision of legal advice. Description revised to reflect same. |
| ABDCMDL_PRIV_6576 | | 1/30/2017 | Mauch, Robert | Madsen, Greg | Campbell, Elizabeth/Esq. | Collis, Steve; Mauch, Robert; Greene, Karen; Zimmerman, Chris; Mays, Steve; Russell, Tiffany; Ball, Chuck; Bennett, Bruce; Rehovsky, Jeffery; Boyd, Roger; Harrison, Andy; Ford, Stephanie | Email with attachments from client to in-house counsel seeking legal advice regarding CSRA audit of distribution center. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6581 | | 2/9/2017 | Mauch, Robert | Madsen, Greg | Campbell, Elizabeth/Esq. | Collis, Steve; Mauch, Robert; Greene, Karen; Zimmerman, Chris; Mays, Steve; Russell, Tiffany; Frary, James; Belden, Peter; Byrum, Stan; Marcum, Cathy; Hackel, Sandy; Vilums, Brianne | Email with attachments from client to in-house counsel seeking legal advice regarding CSRA audit of distribution center. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |

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| ABDCMDL_PRIV_6582 | | 2/10/2017 | Mauch, Robert | Clark, Gina | Weissman, Gabriel | Mauch, Robert; Chou, John/Esq.; Campbell, Elizabeth/Esq.; Pirouz, Korey; Norton, Rita; Heller, Stacie; Tallamy, Brad; Guttman, Tim; Moyer, Lauren; Murphy, Bennett; Mattox, Keri; Zimmerman, Chris; May, David; DeAtley, Danny; Romero, Lauren; Putt, Jordan | Redacted email chain between client and in-house counsel (Campbell, Elizabeth/Esq.; Chou, John/Esq.) discussing legal strategy regarding response to media inquiry. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication to/from in-house counsel is privileged as it related to provision of legal advice. Description revised to reflect same. |
| ABDCMDL_PRIV_6583 | | 2/10/2017 | Mauch, Robert | Norton, Rita | Zimmerman, Chris | Weissman, Gabriel; Mauch, Robert; Chou, John/Esq.; Campbell, Elizabeth/Esq.; Pirouz, Korey; Heller, Stacie; Tallamy, Brad; Clark, Gina; Guttman, Tim; Moyer, Lauren; Murphy, Bennett; Mattox, Keri; May, David; DeAtley, Danny; Romero, Lauren; Putt, Jordan | Redacted email chain between client and in-house counsel (Campbell, Elizabeth/Esq.; Chou, John/Esq.) discussing legal strategy regarding response to media inquiry. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication to/from in-house counsel is privileged as it related to provision of legal advice. Description revised to reflect same. |
| ABDCMDL_PRIV_6592 | | 3/3/2017 | Mauch, Robert | Winter, Matthew | Ball, Chuck | Mauch, Robert; Bak, Hyung/Esq.; Biermaas, Claire; Hendrickson, Stephen; Adams, Jenn; Lightfoot, Emily; Massari, Nathaniel; Mullin, Tom; Nightengale, Brian; Odutola, Akin; Rafferty, George; Senior, David; Tremonte, Richard; Webster, Jay; Meluso, Ginette | Email chain between client and in-house counsel discussing legal advice regarding Board of Directors meeting. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6593 | | 3/3/2017 | Mauch, Robert | Rafferty, George | Mauch, Robert; Bak, Hyung/Esq.; Ball, Chuck; Biermaas, Claire; Hendrickson, Stephen; Adams, Jenn; Lightfoot, Emily; Massari, Nathaniel; Mullin, Tom; Nightengale, Brian; Odutola, Akin; Senior, David; Tremonte, Richard; Webster, Jay; Winter, Matthew | Meluso, Ginette | Email chain between client and in-house counsel discussing legal advice regarding Board of Directors meeting. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6609 | | 3/22/2017 | Mauch, Robert | Weissman, Gabriel | Chou, John/Esq.; Mauch, Robert; Guttman, Tim; Mattox, Keri; Campbell, Elizabeth/Esq.; Moyer, Lauren; Norton, Rita; Heller, Stacie; Tallamy, Brad; Eddy, Julie; Mitchell, Beth; Clark, Gina; DeAtley, Danny; Romero, Lauren; Putt, Jordan; Zimmerman, Chris; May, David | DiCicco, Diana/Tierney; Hummel, Kristin/Tierney; Dodson, Sydney/Tierney | Redacted email chain among client employees and in-house counsel (Campbell, Elizabeth/Esq.) discussing legal strategy regarding responses to media reporting and inquiries. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication to/from in-house counsel is privileged as it related to provision of legal advice. Description revised to reflect same. |
| ABDCMDL_PRIV_6632 | | 9/14/2017 | Mauch, Robert | Mauch, Robert | Norton, Rita | Weissman, Gabriel; Clark, Gina; Campbell, Elizabeth/Esq.; Zimmerman, Chris; Tallamy, Brad | Email from client to in-house counsel seeking legal advice regarding HDA Public Policy Committee. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |

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| ABDCMDL_PRIV_6649 | | 10/13/2017 | Mauch, Robert | Weissman, Gabriel | Chou, John/Esq.; Mauch, Robert; Gaddes, Kathy; Clark, Gina; Guttman, Tim; Nightengale, Brian; Howell, Peyton; Tremonte, Richard; Horvath, Erin; Reed, Chuck; Bak, Hyung/Esq.; Mattox, Keri; Campbell, Elizabeth/Esq.; Lorenz-Fisher, Susan; Pirouz, Korey; Moyer, Lauren; Gunning, Francesca; Norton, Rita; Heller, Stacie; Tallamy, Brad; Eddy, Julie; Mitchell, Beth; Webb, Matthew; Schultz, Andrew; DeAtley, Danny; Moore, Karlene; Lane, Christine; Meluso, Ginette; Savoca, Mia; Wall, Kate; Romero, Lauren; Putt, Jordan; Zimmerman, Chris; May, David; Casalenuovo, Christopher/Esq.; Nachman, Michael/Esq.; Kabosius, Brian/Legal Department; Barrett, Kristy; O'Brien, Adrienne; Dungee, Erin; Kondor, Kristen; Hope, Woody; Mullin, Tom; Rafferty, George | Redacted email chain among client employees and in-house counsel (Campbell, Elizabeth/Esq.) discussing legal strategy regarding responses to media reporting and inquiries. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document in a redacted form. Redacted communication to/from in-house counsel is privileged as it related to provision of legal advice. Description revised to reflect same. |
| ABDCMDL_PRIV_6744 | | 12/17/2017 | Mauch, Robert | Weissman, Gabriel | Collis, Steve; Clark, Gina; Chou, John/Esq.; Mauch, Robert; Gaddes, Kathy; Guttman, Tim; Nightengale, Brian; Howell, Peyton; Tremonte, Richard; Horvath, Erin; Reed, Chuck; Bak, Hyung/Esq.; Mattox, Keri; Campbell, Elizabeth/Esq.; Lorenz-Fisher, Susan; Pirouz, Korey; Moyer, Lauren; Gunning, Francesca; Norton, Rita; Heller, Stacie; Tallamy, Brad; Eddy, Julie; Mitchell, Beth; Webb, Matthew; Schultz, Andrew; DeAtley, Danny; Moore, Karlene; Lane, Christine; Meluso, Ginette; Savoca, Mia; Wall, Kate; Romero, Lauren; Cupo, Jordan; Zimmerman, Chris; May, David; Casalenuovo, Christopher/Esq.; Nachman, Michael/Esq.; Kabosius, Brian/Legal Department; Barrett, Kristy; O'Brien, Adrienne; Dungee, Erin; Kondor, Kristen; Hope, Woody; Mullin, Tom; Greene, Karen; Rafferty, George; Krikorian, Laz; Murphy, Bennett; Biermaas, Claire; Webster, Jay; Winter, Matthew; Scheidt, Scott; Senior, David; Donati, David | Email chain between client and in-house counsel discussing legal advice regarding controlled substances media update. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |

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| ABDCMDL_PRIV_6757 | ABDCMDL00375090 | 1/30/2018 | Mauch, Robert | Weissman, Gabriel | Collis, Steve; Clark, Gina; Chou, John/Esq.; Mauch, Robert; Gaddes, Kathy; Guttman, Tim; Nightengale, Brian; Howell, Peyton; Tremonte, Richard; Horvath, Erin; Reed, Chuck; Bak, Hyung/Esq.; Mattox, Keri; Campbell, Elizabeth/Esq.; Lorenz-Fisher, Susan; Pirouz, Korey; Esposito, Lauren; Gunning, Francesca; Norton, Rita; Heller, Stacie; Tallamy, Brad; Eddy, Julie; Mitchell, Beth; Webb, Matthew; Schultz, Andrew; DeAtley, Danny; Moore, Karlene; Lane, Christine; Meluso, Ginette; Savoca, Mia; Wall, Kate; Romero, Lauren; Cupo, Jordan; Zimmerman, Chris; May, David; Casalenuovo, Christopher/Esq.; Nachman, Michael/Esq.; Kabosius, Brian/Legal Department; Barrett, Kristy; O'Brien, Adrienne; Dungee, Erin; Kondor, Kristen; Hope, Woody; Mullin, Tom; Greene, Karen; Rafferty, George; Krikorian, Laz; Murphy, Bennett; Biermaas, Claire; Webster, Jay; Winter, Matthew; Scheidt, Scott; Senior, David; Donati, David | | Redacted email between client and in-house counsel discussing legal advice regarding controlled substances media update. | Attorney-Client Privilege | Large distribution indicates that privilege does not apply. Subject involves a business matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6810 | ABDCMDL004996 | 12/19/2008 | AmerisourceBergen | Paul Ross | Chris Zimmerman; Edward Hazewski | | Redacted email among clients reflecting communication seeking and providing legal advice from in-house counsel (Johnson, Scott/Esq.) regarding due diligence review of prospective client with a Canadian parent. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document with more limited redactions. Redacted communications between and among clients and in-house counsel seeking/providing legal advice. |
| ABDCMDL_PRIV_6817 | ABDCMDL005006 | 8/11/2004 | AmerisourceBergen | Steve Mays | Eric Cherveney | Greg Madsen | Redacted email among clients reflecting communication sent for the purpose of seeking legal advice of counsel (Debbie Swartz, Esq.) regarding DEA inspection at Corona Distribution Center. | Attorney-Client Privilege | Attorney does not appear to be directly involved in communication. Subject of communication involves a business matter. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document |
| ABDCMDL_PRIV_6826 | ABDCMDL005008 | 12/19/2007 | AmerisourceBergen | | | | Redacted document reflecting legal advice from in-house counsel (Swartz, Debbie/Esq.) regarding customer threshold. | Attorney-Client Privilege | Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document with more limited redactions. Redacted portion of document reflects legal advice from in-house counsel. Description revised to reflect same. |
| ABDCMDL_PRIV_6840 | ABDCMDL005011 | 12/21/2007 | AmerisourceBergen | | | | Redacted document reflecting legal advice of attorney (Johnson, Scott/Esq.) regarding customer contract research. | Attorney-Client Privilege | Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC maintains the privilege designation but will produce the document with more limited redactions. Redacted portion of document reflects legal advice on in-house counsel. Description revised to reflect same. |
| no privilege id | ABDCMDL003693 | 10/10/2017 | AmerisourceBergen | | | | Attached | "Privileged" | Subject involves a business/regulatory matter, and not a legal one. Privilege claim is inconsistent w/ prior discovery rulings. | ABDC withdraws the privilege designation and will produce the document without redactions |